

# FOOD DEFENSE

## Toolkit for Restaurants



**MULTNOMAH COUNTY**  
**FOOD SAFETY HOTLINE**  
**(503) 988-3663 ext. 24662**

*Disponible en Español*

**Current, local information about:**

- Food Recalls
- Intentional Contamination Events
- Emergencies



**Public Health**  
*Prevent. Promote. Protect.*



**Health Department**



# INTRODUCTION

Multnomah County Environmental Health, with funding from the FDA, has created this Food Defense toolkit to help restaurants secure their facilities from intentional food contamination.

Though rare, attacks on our food supply do happen. As you may know, in the 1980s Oregon became one of the only states in the nation to experience an intentional food contamination event –

***In 1984, Members of a cult led by Bhagwan Shree Rajneesh intentionally contaminated salad bars in Wasco county (the Dalles) with salmonella, infecting more than 750 individuals.***

*How to use this toolkit:* \_\_\_\_\_

Work through the progress chart on the following page, beginning with conducting a Restaurant Risk Assessment to determine to which risks your restaurant is most vulnerable.

Once you have identified the areas you would like to improve, develop a Risk Control Plan, and conduct a Training on Food Defense so that managers and staff become aware of the Food Defense risks and protocols you have developed.

Don't forget to look in the appendix, where you will find:

- Posters
- Signs
- An Employee Training Video on Food Defense
- Blank Incident Report forms to use in case of an attack

We hope that you will find these materials useful and we welcome you to institute some of the prevention measures in this manual in your food service facility. The entire toolkit is downloadable from our website:

**[www.mchealthinspect.org](http://www.mchealthinspect.org)**

***Thank you for continuing to do your best to protect the health of people in our community!***



**Public Health**  
Prevent. Promote. Protect.



# Contents

## FOOD DEFENSE DEFINITION AND HISTORY - PG 6

- What is Food Defense?
- Food Terrorism in History
- Why Attack Restaurants?

## STEP A: RESTAURANT RISK ASSESSMENT - PG 9

- Steps to Take to Prevent Intentional Contamination
- Manager Assessment: Current Operating Procedures
- Exposes Potential Security Gaps

## STEP B: DEVELOPING A RISK CONTROL PLAN - PG 21

- Create a Plan to Address Identified Security Concerns
- Sample Plan Included
- Step-by-Step Guidance for Your Unique Facility

## STEP C: INCIDENT RESPONSE - PG 39

- Isolating Foods
- Incident Report
- Emergency Contact Numbers

## STEP D: MANAGEMENT AND EMPLOYEE TRAINING - PG 45

- Training Curriculum
- Quick Response Poster
- Video: Employees are the FIRST Line of Food Defense

### TOOL KIT PROGRESS CHART

- |                          |   |
|--------------------------|---|
| <input type="checkbox"/> | <b>STEP A:</b> Complete Restaurant Risk Assessment, <i>page 9</i> |
| <input type="checkbox"/> | <b>STEP B:</b> Develop a Risk Control Plan, <i>page 21</i>        |
| <input type="checkbox"/> | <b>STEP C:</b> Develop an Incident Response Plan, <i>page 39</i>  |
| <input type="checkbox"/> | <b>STEP D:</b> Train Staff, <i>page 45</i>                        |



# FOOD DEFENSE DEFINITION AND HISTORY

## *What Is Food Defense?*

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**Food Safety** programs generally focus on preventing the **unintentional** contamination of food and food contact surfaces by eliminating or minimizing the growth of bacteria. This is what you may be familiar with from your bi-annual inspection visits.

**Food Defense** specifically prevents **intentional** contamination of food and food contact surfaces by protecting food from biological, physical and chemical attacks.

Although intentional contamination events have been rare in the US, an act of food terrorism could inflict catastrophic damage on our communities in the form of economic losses, loss of life or health, and erosion of public trust. This tool kit will help with development of procedures to protect customers, employees, and your restaurant business from intentional food contamination.

## *Food Terrorism in History*

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- 1984** Members of a cult headed by Bhagwan Shree Rajneesh used cultivated Salmonella bacteria to contaminate restaurant salad bars in Wasco county Oregon (the Dalles), infecting more than 750 individuals in the hopes of affecting the outcome of a local election. Fortunately, there were no fatalities.
- 1996** A former laboratory employee pled guilty to contaminating a tray of doughnuts and muffins with the foodborne pathogen Shigella dysenteriae Type 2. The employee used an unoccupied supervisor's computer to send out an "email inviting forty five other lab workers to enjoy pastries in the employee break room." Twelve of the forty five employees ate some amount of a pastry and eventually contracted severe gastrointestinal illness. Four of those employees required hospitalization but there were no fatalities. The origin of the pathogen was the laboratory itself, and lax security made it possible for this intentional contamination to occur.
- 2003** A Michigan supermarket employee was indicted for intentionally contaminating 200 pounds of ground beef with a nicotine-based pesticide. The CDC reported that 92 individuals became ill after consuming the ground beef.
- 2005** A New York McDonald's employee was arrested in a sting operation at the restaurant where a police officer had bitten into a burger filled with shards of glass a few hours earlier. The officer suffered cuts to his mouth and throat.

## *Why attack restaurants?*

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Food defense has economic, health, societal, psychological, and political significance. Deliberate contamination of the food supply could cause significant public health consequences and widespread public fear. It could also have a devastating economic impact and result in the loss of public confidence in the safety of our food and trust in our communities.

# Potential Attackers

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In order to successfully tamper with a food product, an aggressor must have **access to food for sufficient time** and be able to **commit the crime without discovery**.

## Typical attackers may be:

**Disgruntled insiders:** (i.e. employees, delivery personnel, cleaning personnel, etc.) May be mentally unstable, operating impulsively with minimal planning. This may be the most difficult group to stop because they may have legitimate access to the food.

**Criminals:** Generally interested in high-value targets (recognizable popular restaurants, restaurants with high volume of customers) or targets that pose a low risk of detection.

**Protestors:** are usually politically or issue-oriented. They generally act out of frustration, discontent, or anger. They are primarily interested in publicity for their cause, and, as a result generally do not intend to injure people, but may be superficially destructive.

**Subversives**, also known as saboteurs, assassins, guerrillas, or commandos are sophisticated, highly skilled, and capable of meticulous planning. Subversives typically operate in small groups with objectives including death and destruction, targeting personnel, equipment and operations.

**Terrorists** are usually politically or ideologically oriented. They typically work in small, well-organized groups. Their objectives include death, destruction, theft, and publicity.







# RESTAURANT RISK ASSESSMENT

## STEP A

### PERFORM A RESTAURANT RISK ASSESSMENT

After reading the following preventive measures, complete the Restaurant Risk Assessment checklist to determine where gaps exist in your ability to prevent intentional contamination of food in your restaurant.

#### **Access to Kitchen: Restrict entry to non-public areas of the restaurant**

Accompany all visitors to the non-public portions of the facility.

#### **Loitering: Keep track of who is on and off duty, and the location in which a person should be working.**

Ex-employees should not be allowed at the work site.

An employee who plans to contaminate food may attempt to access areas not normally associated with his/her job function.

#### **Building Security: Protect doors, windows, roof and vent openings and other access points.**

This includes access to refrigerators, freezers and bins outside the primary kitchen area.

Locks, alarms, and video surveillance can increase the difficulty of an intruder gaining access to the interior of a restaurant.

#### **Food Deliveries: Inspect product, packaging, and paperwork at receipt of deliveries.**

Contaminated food may contain abnormal powders, liquids, stains or odors, show evidence of resealing, or compromised packaging. Shipping documents with suspicious alterations may accompany contaminated items.

#### **Self-Service: Monitor public areas for suspicious activity.**

A customer contaminating food may return food that he/she has already contaminated to a counter or salad bar or may spend an inordinate amount of time in one part of the restaurant.

## **Employee Training: Make efforts to involve staff in food defense.**

Encourage employees to report suspicious activities, possible product tampering or suspected security system weaknesses to management.

Display the posters included in this kit prominently, where staff will see and become familiar with prevention tips and emergency response.

## **Contaminated Foods: Be prepared and trained to respond to an attack.**

If you suspect intentional contamination of food, contact law enforcement immediately. Know how and what to report and who to contact.



## **Instructions for Step A: Restaurant Risk Assessment**

The purpose of the following assessment checklist is to identify your restaurant's vulnerability to intentional contamination. We have identified eight different risk factors that may impact your ability to prevent food contamination. Within each risk factor, we have identified food defense risk controls that may mitigate your facility's risk.

Please read through each section on the assessment form and check whether you have the controls in place or not.

Based on your level of risk, identify which risks you would like to address with a Risk Control Plan. Forms are located in the next section, beginning on page 21.



# RESTAURANT RISK ASSESSMENT

## RISK #1 - ACCESS TO KITCHEN

Are customers, service and delivery personnel, inspectors (fire, health, building, etc), and other visitors required to show valid identification before entering the kitchen food service and food storage areas?

☐ Yes

☐ No

☐ Don't know

### FOOD DEFENSE CONTROLS:

a. ☐ Yes ☐ No

Do you require photo identification?

Equipment needs:

I.D. cards

I.D. card reader

b. ☐ Yes ☐ No

Do you require manager or person-in-charge for entry approval?

c. ☐ Yes ☐ No

Do you have a standard operating procedure addressing kitchen entry?

d. ☐ Yes ☐ No

Do employees ask visitors where and why they need to visit?

e. ☐ Yes ☐ No

Do you maintain a daily visitor sign-in log including:

Visitor Name

Person Granting Approval

Identification Used

Secure location for log, accessible in an emergency?

f. ☐ Yes ☐ No

Do you have another method in place to mitigate this risk?

If yes, what?: \_\_\_\_\_



# RESTAURANT RISK ASSESSMENT

## RISK #2 - LOITERING

Are there rules to prevent employees, off-duty employees, and visitors from loitering in the kitchen food preparation or food storage areas?

☐ Yes

☐ No

☐ Don't know

### Food Defense Controls:

- a. ☐ Yes ☐ No Does the restaurant have an employment rule or policy against loitering?
- b. ☐ Yes ☐ No Is the no- loitering rule enforced?
- c. ☐ Yes ☐ No Do employees have a designated break area? If employees can leave the work area to take breaks, it is easier to distinguish between an employee with a legitimate reason to be in an area of food preparation, and one who may be waiting for an opportunity to act with malicious intent.
- d. ☐ Yes ☐ No Is there a designated area away from food preparation and food storage for storing personal items?
- e. ☐ Yes ☐ No Are there security cameras in food preparation and storage areas?
- f. ☐ Yes ☐ No Does the hiring manager require procedural acknowledgement (signed form) for new employees, agreeing to loitering policy?
- g. ☐ Yes ☐ No Do you have another method in place to mitigate this risk?  
If yes, what?: \_\_\_\_\_

# RESTAURANT RISK ASSESSMENT

## RISK #3 - BUILDING SECURITY

Are outside doors and windows to the restaurant locked to prevent unauthorized entry into the kitchen and storage areas?

☐ Yes

☐ No

☐ Don't know

### Food Defense Controls:

- a. ☐ Yes ☐ No Is there a clearly outlined procedure for monitoring windows and doors assigned to particular employees?
- b. ☐ Yes ☐ No Is there a security system to monitor outside access?
- c. ☐ Yes ☐ No Is there a security system to monitor internal food storage areas?
- d. ☐ Yes ☐ No Do screen doors lock if the back door is left open for ventilation?
- e. ☐ Yes ☐ No Do window screens lock?
- f. ☐ Yes ☐ No Does restaurant have a procedure to check all foods for contamination if restaurant suffered break-in during non-business hours?
- g. ☐ Yes ☐ No Is a building security rule included in standard operating procedures manual?
- h. ☐ Yes ☐ No Do you have another method in place to mitigate this risk?  
If yes, what?: \_\_\_\_\_
- \_\_\_\_\_

# RESTAURANT RISK ASSESSMENT

## RISK #4 - FOOD DELIVERIES

Is food always delivered to staff on duty (not left outside your restaurant unattended on a loading dock or in the parking lot)?

☐ Yes

☐ No

☐ Don't know

### Food Defense Controls:

- a. ☐ Yes ☐ No Do you require vendors to deliver foods during normal operating hours or only when a manager is available to check in the food items?
- b. ☐ Yes ☐ No Do you notify vendors of refusal to accept foods delivered when no one is present to accept delivery?
- c. ☐ Yes ☐ No Do you require employees to store foods away immediately after delivery and/or secure area?
- d. ☐ Yes ☐ No Do you provide adequate personnel to accept deliveries and get food put away to prevent exposure to tampering?
- e. ☐ Yes ☐ No Do you review delivery invoices for any items missing or any items appearing but not ordered, or any items of a brand different than on invoice?
- f. ☐ Yes ☐ No Is there a food delivery protocol in the restaurant's standard operating procedures manual?
- g. ☐ Yes ☐ No Do you have another method in place to mitigate this risk?  
If yes, what?: \_\_\_\_\_  
\_\_\_\_\_

# RESTAURANT RISK ASSESSMENT

## RISK #5 - SELF SERVICE

Does your restaurant provide self-service food (i.e. salad bar, buffet line, or common use condiments) for customers? If yes, are employees trained to monitor these self-service food bars?"

☐ Yes

☐ No

☐ N/A / Don't know

### Food Defense Controls:

- a. ☐ Yes ☐ No Do employees monitor self-service operations routinely?
- b. ☐ Yes ☐ No Are there surveillance cameras to identify suspects involved in possible contamination attempts?
- c. ☐ Yes ☐ No Are self-service operations located for ease of monitoring by employees?
- d. ☐ Yes ☐ No Are employees assigned to work stations or areas which will allow them to monitor self service foods?
- e. ☐ Yes ☐ No When re-supplying food at self-service bars, use fresh containers of food – do you refrain from refilling containers that were in-use?
- f. ☐ Yes ☐ No Do you provide staff with a reporting form for use in case of a suspected intentional contamination event?
- g. ☐ Yes ☐ No Does your standard operating procedures manual include a protocol for monitoring self-service areas?
- h. ☐ Yes ☐ No Do you already have a method in place to mitigate this risk?  
If yes, what?: \_\_\_\_\_  
\_\_\_\_\_

# RESTAURANT RISK ASSESSMENT

## RISK #6 - EMPLOYEE TRAINING

Are employees trained to look for and respond to intentional food contamination? If this is the first time you are completing a food defense risk assessment it is likely that employees have not yet been exposed to the concept of food defense. We recommend that food defense concepts be included in training for new hires and in follow up training for all staff and the measures below may be good starting points.

☐ Yes

☐ No

☐ Don't know

### Food Defense Controls:

**See Employee Training section of this toolkit (pg 38)**

- a. ☐ Yes ☐ No Do you review with employees the history of intentional contamination of food?
- b. ☐ Yes ☐ No Do you review the Food Defense responsibilities of each employee?
- c. ☐ Yes ☐ No Do you show employees the FDA FIRST Video (included in this toolkit as an appendix)?
- d. ☐ Yes ☐ No Do you review Food Defense measures included in your restaurant's standard operating procedures manual?
- e. ☐ Yes ☐ No Do you have another method in place to mitigate this risk?  
If yes, what?: \_\_\_\_\_  
\_\_\_\_\_



# RESTAURANT RISK ASSESSMENT

## RISK #7 - MANAGER TRAINING

Are managers or persons-in-charge trained to respond to a suspected intentional contamination incident? If this is the first time you are completing a food defense risk assessment it is likely that management has not yet been exposed to the concept of food defense. We recommend that food defense concepts be included in training for new hires and in follow up training for all staff, and the measures below may be good starting points.

☐ Yes

☐ No

☐ Don't know

### Food Defense Controls:

**Refer to manager training materials in this toolkit (pg 48)**

- a. ☐ Yes ☐ No Are you aware of the history of intentional food contamination and the potential for it in your restaurant?
- b. ☐ Yes ☐ No Do managers review all items in this toolkit?  
- Restaurant Risk Assessment  
- Risk Control Plans  
- Suspected Contamination Incident Report  
- Posters  
- Emergency Response Poster
- c. ☐ Yes ☐ No Do you review the Food Defense responsibilities of management?
- d. ☐ Yes ☐ No Do you show managers the FDA FIRST Video (included in this toolkit)?
- e. ☐ Yes ☐ No Do you review Food Defense measures included in your restaurant's standard operating procedures manual?
- f. ☐ Yes ☐ No Do you perform a periodic review of the restaurant's Food Defense strategy to update as needed due to personnel or procedural changes? Annual review is recommended, along with reviews of the strategy with newly hired managers.
- g. ☐ Yes ☐ No Do you have another method in place to mitigate this risk?  
If yes, what?: \_\_\_\_\_
-

# RESTAURANT RISK ASSESSMENT

## RISK #8 - CONTAMINATED FOOD

Does your restaurant have a procedure for isolating the area around food that is suspected to have been contaminated, and reporting the incident to the proper authorities?

☐ Yes

☐ No

☐ Don't know

### Food Defense Controls:

- a. ☐ Yes ☐ No Does your restaurant have a protocol for reporting suspected food contamination incidents to the proper law enforcement authority? (911 if life threatening emergency/(503) 823-3333 to reach the sheriff/police dept. if lives are not in imminent danger)
- b. ☐ Yes ☐ No Does your restaurant have a protocol for reporting suspected food contamination incidents to the Health Department if food may have been served to people? The Health Department number is (503) 988 3400.
- c. ☐ Yes ☐ No Does your restaurant have a protocol for isolating suspect foods from staff and customers? (e.g. close doors, tape/seal off area, remove people from area)?
- d. ☐ Yes ☐ No Is there a protocol to note description of suspect, where suspect has been in the restaurant, what foods may have been exposed, and whether there should be a full or partial closure of operations until situation has been resolved?
- e. ☐ Yes ☐ No Do you have a protocol to forbid entry into the isolated area? (e.g. post a warning sign outside area or station an employee there to prevent entry)
- f. ☐ Yes ☐ No Have you posted an Emergency Contact list to report incidents or emergencies?
- g. ☐ Yes ☐ No Does your standard operating procedures manual include Food Defense Incident Response?
- h. ☐ Yes ☐ No Do you have another method in place to mitigate this risk?  
If yes, what?: \_\_\_\_\_  
\_\_\_\_\_

# DEVELOPING A RISK CONTROL PLAN

## STEP B

### RISK CONTROL PLANS

Based on the Restaurant Risk Assessment you completed, you may develop a risk control plan for a risk identified by a “no” or “don’t know” answer.

Your restaurant is different from other facilities and your employees are different than other facility workers so you need to design a plan that works for your unique operation.

Use separate risk control plans for all vulnerabilities identified. As each vulnerability is addressed, enter your action plan into the Food Defense Work Plan (the table that covers all eight items in the Restaurant Risk Assessment) in the appendix.

For Risk Control Plans to address risks #6 and #7 (Employee and Manager training), review the Training section of the toolkit, pages 45-50.



# Food Defense Risk Control Plan

## RISK #1 - ACCESS TO KITCHEN

Person responsible for designing plan: \_\_\_\_\_

Identify procedures needed to address the above risk in your facility. Examples on the facing page may provide ideas of how to complete this form. The design of your restaurant and management policies will require a risk control plan suited to your specific needs. Use the table below to formulate your risk control plan. The ✓ column allows you to track your progress.

Procedure needed	Implementation Steps	✓
Equipment Needs:		
Training Needs:		
Records/Documentation needs:		

Completion Date: \_\_\_\_\_

### ***Example of completed form***

<b>Procedure needed</b>	<b>Implementation Steps</b>
<p>Require photo Identification</p> <p>Require manager or person-in-charge for entry approval</p> <p>Implement a daily visitor sign-in log or other documentation</p> <ul style="list-style-type: none"> <li>- Visitor Name</li> <li>- Person Granting Approval</li> <li>- Identification Used</li> </ul> <p>Other:</p>	<p>Develop policy/procedure. Obtain management authorization.</p> <p>Develop policy/procedure. Obtain management authorization.</p> <p>Develop policy/procedure. Obtain management authorization.</p>
<p><b>Equipment Needs:</b></p> <p>I.D. card reader</p> <p>Security cameras</p> <p>Other:</p>	<p>Research and obtain appropriate equipment</p> <p>Research and obtain appropriate equipment</p>
<p><b>Training Needs:</b></p> <p>Train employees on new procedures</p> <p>Train managers on new procedures</p> <p>Educational materials:</p> <p>Training new employees</p> <p>Other:</p>	<p>Schedule date and time to train current staff</p> <p>Schedule date and time to train current staff</p> <p>Determine what materials are needed, how much to keep on hand, and when to update.</p> <p>Incorporate into new employee orientation.</p>
<p><b>Records/Documentation needs:</b></p> <p>Secure storage location for visitor's log, accessible in an emergency:</p> <p>Include Kitchen access protocol in standard operating procedures manual.</p> <p>Document training received by employees</p> <p>Other:</p>	<p>Obtain storage cabinet.</p> <p>Place new policy and procedures in company manual.</p> <p>Have employee training documented in files.</p>



# Food Defense Risk Control Plan

## RISK #2 - LOITERING

Person responsible for designing plan: \_\_\_\_\_

Identify procedures needed to address the above risk in your facility. Examples on facing page may provide ideas of how to complete this form. The design of your restaurant and management policies will require a risk control plan suited to your specific needs. Use the table below to formulate your risk control plan. The ✓ column allows you to track your progress.

Procedure needed	Implementation Steps	✓
Equipment Needs:		
Training Needs:		
Records/Documentation needs:		

Completion Date: \_\_\_\_\_

### Example of completed form

Procedure needed	Implementation Steps
<p>Employment rule against loitering</p> <p>Person responsible for enforcing no-loitering rule:</p> <p>Provide a break area</p> <p>Provide an area away from food preparation and food storage for storing personal items</p> <p>Other:</p>	<p>Develop policy/procedure</p> <p>Select and train</p> <p>Designate area</p> <p>Designate area</p>
<p><b>Equipment Needs:</b></p> <p>Break area seating</p> <p>Storage for personal items</p> <p>Security cameras</p> <p>Other:</p>	<p>Obtain seating</p> <p>Obtain storage equipment</p> <p>Install system</p>
<p><b>Training Needs:</b></p> <p>Train employees on new procedures</p> <p>Train managers on new procedures</p> <p>Educational materials:</p> <p>Training new employees</p> <p>Other:</p>	<p>Schedule date and time to train current staff</p> <p>Schedule date and time to train current staff</p> <p>Determine what materials are needed, how much to keep on hand, and when to update.</p> <p>Incorporate into new employee orientation.</p>
<p><b>Records/Documentation needs:</b></p> <p>Include Loitering rule in standard operating procedures manual</p> <p>Procedural acknowledgement (signed form) for employees, agreeing to policy.</p> <p>Other:</p>	<p>Incorporate into company manual</p> <p>Provide form and place in files</p>

# *Food Defense Risk Control Plan*

## **RISK #3 - BUILDING SECURITY**

Person responsible for designing plan: \_\_\_\_\_

Identify procedures needed to address the above risk in your facility. Examples on facing page may provide ideas of how to complete this form. The design of your restaurant and management policies will require a risk control plan suited to your specific needs. Use the table below to formulate your risk control plan. The ✓ column allows you to track your progress.

<b>Procedure needed</b>	<b>Implementation Steps</b>	<b>✓</b>
<b>Equipment Needs:</b>		
<b>Training Needs:</b>		
<b>Records/Documentation needs:</b>		

**Completion Date:** \_\_\_\_\_

### Example of completed form

Procedure needed	Implementation Steps
<p>Designate responsibility and procedure for monitoring windows and doors.</p> <p>Install a security system to monitor outside access.</p> <p>Install locks for screen doors if back door left open for ventilation</p> <p>Install locks for window screens.</p> <p>Design procedure to check all foods for contamination if restaurant suffered break-in during non-business hours.</p> <p>Other:</p>	<p>Assign staff. Develop procedure.</p> <p>Research and obtain appropriate system</p> <p>Obtain appropriate equipment and install</p> <p>Obtain appropriate equipment and install</p> <p>Develop procedure and formalize in policies.</p>
<p><b>Equipment Needs:</b></p> <p>Door locks</p> <p>Window locks</p> <p>Screens</p> <p>Security Cameras</p> <p>Other:</p>	<p>Obtain as needed</p> <p>Obtain as needed</p> <p>Obtain as needed</p> <p>Obtain as needed</p>
<p><b>Training Needs:</b></p> <p>Train employees on new procedures</p> <p>Train managers on new procedures</p> <p>Educational materials:</p> <p>Training new employees</p> <p>Other:</p>	<p>Schedule date and time to train current staff</p> <p>Schedule date and time to train current staff</p> <p>Determine what materials are needed, how much to keep on hand, and when to update.</p> <p>Incorporate into new employee orientation.</p>
<p><b>Records/Documentation needs:</b></p> <p>Reports for any break-in</p> <p>Documentation of foods checked for tampering.</p> <p>Include building security in standard operating procedures manual</p> <p>Provide storage for records</p>	<p>Develop report form</p> <p>Develop recording form</p> <p>Incorporate procedures</p> <p>Provide secure storage</p>

# *Food Defense Risk Control Plan*

## **RISK #4 - FOOD DELIVERIES**

Person responsible for designing plan: \_\_\_\_\_

Identify procedures needed to address the above risk in your facility. Examples on facing page may provide ideas of how to complete this form. The design of your restaurant and management policies will require a risk control plan suited to your specific needs. Use the table below to formulate your risk control plan. The ✓ column allows you to track your progress.

<b>Procedure needed</b>	<b>Implementation Steps</b>	<b>✓</b>
<b>Equipment Needs:</b>		
<b>Training Needs:</b>		
<b>Records/Documentation needs:</b>		

**Completion Date:** \_\_\_\_\_



## Example of completed form

Procedure needed	Implementation Steps
<p>Require vendors to deliver foods during normal operating hours or only when a manager is available to check in the food items.</p> <p>Notify vendor of refusal to accept foods delivered when no one is present to accept delivery.</p> <p>Require employees to store foods away immediately and/or secure area.</p> <p>Provide adequate personnel to accept deliveries and get food put away to prevent exposure to tampering.</p> <p>Other:</p>	<p>Identify vendors and contact to make needed changes</p> <p>Contact vendors with policy</p> <p>Establish new procedure and oversight</p> <p>Assign staff and responsibilities</p>
<p><b>Equipment Needs:</b></p> <p>Equipment for securing delivery area.</p> <p>Other:</p>	<p>Research and obtain appropriate items</p>
<p><b>Training Needs:</b></p> <p>Train employees on new procedures</p> <p>Train managers on new procedures</p> <p>Training new employees</p> <p>Educational materials:</p> <p>Other:</p>	<p>Schedule date and time to train current staff</p> <p>Schedule date and time to train current staff</p> <p>Determine what materials are needed, how much to keep on hand, and when to update. Incorporate into new employee orientation.</p>
<p><b>Records/Documentation needs:</b></p> <p>Review delivery invoices for any items missing or any items appearing but not ordered, or any items of brand different than on invoice.</p> <p>Include food delivery protocol in standard operating procedures manual.</p> <p>Other:</p>	<p>Develop policy/procedure. Work with vendor on policy and procedures for matching invoice items with delivered items.</p> <p>Incorporate in company manual</p>

# Food Defense Risk Control Plan

## RISK #5 - SELF SERVICE

Person responsible for designing plan: \_\_\_\_\_

Identify procedures needed to address the above risk in your facility. Examples on facing page may provide ideas of how to complete this form. The design of your restaurant and management policies will require a risk control plan suited to your specific needs. Use the table below to formulate your risk control plan. The ✓ column allows you to track your progress.

Procedure needed	Implementation Steps	✓
Equipment Needs:		
Training Needs:		
Records/Documentation needs:		

Completion Date: \_\_\_\_\_

### Example of completed form

Procedure needed	Implementation Steps
<p>Have employees monitor self-service operations routinely.</p> <p>Install surveillance cameras to identify suspects involved in possible contamination attempt.</p> <p>Re-locate self-service operations for ease of monitoring by employees.</p> <p>Re-locate employee work stations or work area assignments to areas which will allow them to monitor self service foods.</p> <p>When re-supplying food at self-service bars, use fresh containers of food – do not refill containers that were in-use.</p> <p>Other:</p>	<p>Develop procedure and assign staff</p> <p>Research and install appropriate system</p> <p>Review operations, make changes, assign staff responsibility</p> <p>Review and make changes</p> <p>Revise procedures and change policies</p>
<p><b>Equipment Needs:</b></p> <p>Security systems</p> <p>Food Bar equipment designed for ease of visibility.</p> <p>Other:</p>	<p>Research and install appropriate system</p> <p>Review and obtain appropriate equipment</p>
<p><b>Training Needs:</b></p> <p>Train employees on new procedures</p> <p>Train managers on new procedures</p> <p>Educational materials:</p> <p>Training new employees</p> <p>Other:</p>	<p>Schedule date and time to train current staff</p> <p>Schedule date and time to train current staff</p> <p>Determine what materials are needed, how much to keep on hand, and when to update.</p> <p>Incorporate into new employee orientation.</p>
<p><b>Records/Documentation needs:</b></p> <p>Provide reporting form for use in case of a suspected intentional contamination incident.</p> <p>Include protocol for monitoring self service areas in standard operating procedures manual.</p> <p>Other:</p>	<p>Develop or use form included in tool kit</p> <p>Develop and incorporate into company manual</p>

# Food Defense Risk Control Plan

## RISK #6 - EMPLOYEE TRAINING

Person responsible for designing plan: \_\_\_\_\_

Identify procedures needed to address the above risk in your facility. Examples on facing page may provide ideas of how to complete this form. The design of your restaurant and management policies will require a risk control plan suited to your specific needs. Use the table below to formulate your risk control plan. The ✓ column allows you to track your progress. Review “Step D - “Employee Training” on page 45 of this toolkit before completing this plan so you become familiar with the training materials provided in this kit.

Procedure needed	Implementation Steps	✓
Equipment Needs:		
Training Needs:		
Records/Documentation needs:		

Completion Date: \_\_\_\_\_

### Example of completed form

Procedure needed	Implementation Steps
<p><b>See Employee Training section of this toolkit</b></p> <p>Review the history of food defense</p> <p>Review all items in this tool kit</p> <p>Review the Food Defense responsibilities of each employee.</p> <p>Other:</p>	<p>Use material in Tool Kit or use company training materials</p> <p>Provide copies to staff</p> <p>Develop materials and provide copies.</p>
<p><b>Equipment Needs:</b></p> <p>Equipment needed to provide the training:</p> <p>-DVD player</p> <p>-Food Defense Toolkit</p> <p>-Other:</p> <p>FDA FIRST Video (included in this toolkit)</p> <p>Other:</p>	<p>List and obtain</p> <p>Use Tool Kit video</p>
<p><b>Training Needs:</b></p> <p>Train employees on new procedures</p> <p>Train managers on new procedures</p> <p>Educational materials:</p> <p>Training new employees</p> <p>Other:</p>	<p>Schedule date and time to train current staff</p> <p>Schedule date and time to train current staff</p> <p>Determine what materials are needed, how much to keep on hand, and when to update.</p> <p>Incorporate into new employee orientation.</p>
<p><b>Records/Documentation needs:</b></p> <p>Log to keep track of who has received training.</p> <p>Other:</p>	<p>Provide and store in files</p>

# Food Defense Risk Control Plan

## RISK #7 - MANAGER TRAINING

Person responsible for designing plan: \_\_\_\_\_

Identify procedures needed to address the above risk in your facility. Examples on facing page may provide ideas of how to complete this form. The design of your restaurant and management policies will require a risk control plan suited to your specific needs. Use the table below to formulate your risk control plan. The ✓ column allows you to track your progress. Review Step D: "Manager Training" on page 49 of this toolkit before completing this plan so you become familiar with the training materials provided in this kit.

Procedure needed	Implementation Steps	✓
Equipment Needs:		
Training Needs:		
Records/Documentation needs:		

Completion Date: \_\_\_\_\_

## Example of completed form

Procedure needed	Implementation Steps
<p><b>Refer to training materials offered in this toolkit for training managers</b></p> <p>Review the history of food defense</p> <p>Review all items in this tool kit</p> <p>Review the Food Defense responsibilities of each employee.</p> <p>Plan an annual review of the restaurant's Food Defense strategy to update as needed due to personnel changes or procedural changes.</p> <p>Other:</p>	<p>Make copies for training</p> <p>Select item from tool kit for training</p> <p>Review</p> <p>Establish responsibilities for each position and incorporate into training</p> <p>Review during staff or manager meeting</p>
<p><b>Equipment Needs:</b></p> <p>Equipment needed to provide the training:</p> <p>-DVD player</p> <p>-Food Defense Toolkit</p> <p>-Other:</p> <p>FDA FIRST Video (included in this toolkit)</p> <p>Other:</p>	<p>Review materials to determine equipment needs</p> <p>Provide video player</p>
<p><b>Training Needs:</b></p> <p>Train employees on new procedures</p> <p>Train managers on new procedures</p> <p>Educational materials:</p> <p>Training new employees</p> <p>Other:</p>	<p>Schedule date and time to train current staff</p> <p>Schedule date and time to train current staff</p> <p>Determine what materials are needed, how much to keep on hand, and when to update.</p> <p>Incorporate into new employee orientation.</p>
<p><b>Records/Documentation needs:</b></p> <p>Food Defense documents:</p> <ul style="list-style-type: none"> <li>-Vulnerability Assessment</li> <li>-Risk Control Plan</li> <li>-Incident Report</li> <li>-Quarantine stickers</li> <li>-Quick Response Poster</li> <li>-Emergency Contact numbers</li> </ul> <p>Standard Operating Procedures Manual</p> <p>Other:</p>	<p>Provide storage unit</p> <p>Post tool kit posters at appropriate locations</p> <p>Keep manual in accessible location for emergencies</p>

# Food Defense Risk Control Plan

## RISK #8 - CONTAMINATED FOOD

Person responsible for designing plan: \_\_\_\_\_

The Risk Control Plan for this risk differs from the previous 7 plans in that it should not be tailored to your individual restaurant, but follow a standard protocol designed to aid law enforcement authorities in protecting the safety of your staff and the public as quickly as possible. The appropriate procedure for dealing with a suspected intentional contamination event is to immediately call law enforcement authorities to report the incident, and then to make sure that staff and customers do not come into contact with the suspected food. We have filled in the "Procedure needed" section of this plan to reflect the recommended steps you should take if you suspect food has been intentionally contaminated in your restaurant. Please think about what equipment, training and documentation you would like to make a part of your plan.

Procedure needed	Implementation Steps	✓
<b>REPORT INCIDENT TO APPROPRIATE OFFICIALS</b>		
<b>✓ LAW ENFORCEMENT</b> <ul style="list-style-type: none"><li>• <b>Call 911</b> in a life-threatening situation: If people are showing illness, suspect is threatening others, or staff and/or customers are in life-threatening situation.</li><li>• <b>Call (503) 823-3333</b> Multnomah County Sheriff/Portland Police, for non-life threatening intentional food contamination incidents.</li></ul> <b>✓ HEALTH DEPARTMENT</b> <ul style="list-style-type: none"><li>• <b>Call the Health Department (503) 988-3400</b> if contaminated food may have been served to people.</li></ul> <b>PREVENT ILLNESS &amp; INJURY</b> <ul style="list-style-type: none"><li>• Do not allow staff or customers to disturb suspected food.</li><li>• Isolate area around suspected food from staff and customers (e.g., close doors, tape/seal off area, remove people from area.</li><li>• Forbid entry into area. (Consider using Contaminated Food sign included in appendix of toolkit.)</li></ul>		
<b>Equipment Needs:</b>		
<b>Training Needs:</b>		
<b>Records/Documentation needs:</b>		



**Completion Date:** \_\_\_\_\_

**Example of completed form**

Procedure needed	Implementation Steps
<p align="center"><b>REPORT INCIDENT TO APPROPRIATE OFFICIALS</b></p> <p>✓ <b>LAW ENFORCEMENT</b></p> <ul style="list-style-type: none"> <li>• <b>Call 911</b> in a life-threatening situation: If people are showing illness, suspect is threatening others, or staff and/or customers are in life-threatening situation.</li> <li>• <b>Call (503) 823-3333</b> Multnomah County Sheriff/Portland Police, for non-life threatening intentional food contamination incidents.</li> </ul> <p>✓ <b>HEALTH DEPARTMENT</b></p> <ul style="list-style-type: none"> <li>• <b>Call the Health Department (503) 988-3400</b> if contaminated food may have been served to people.</li> </ul> <p align="center"><b>PREVENT ILLNESS &amp; INJURY</b></p> <ul style="list-style-type: none"> <li>• Do not allow staff or customers to disturb suspected food.</li> <li>• Isolate area around suspected food from staff and customers (e.g., close doors, tape/seal off area, remove people from area.</li> <li>• Forbid entry into area. (Consider using Contaminated Food sign included in appendix of toolkit.)</li> </ul>	
<p><b>Equipment Needs:</b></p> <p>Material (tape, twine cord, rope, chain) for cordoning off area of suspected contamination</p> <p>Contaminated food sign (see appendix of toolkit)</p> <p>Post Emergency Contact List to report events or emergencies</p> <p>Other:</p>	<p>Purchase</p> <p>Post</p> <p>Post</p>
<p><b>Training Needs:</b></p> <p>Train employees on new procedures</p> <p>Train managers on new procedures</p> <p>Educational materials:</p> <p>Training new employees</p> <p>Other:</p>	<p>Schedule date and time to train current staff</p> <p>Schedule date and time to train current staff</p> <p>Determine what materials are needed, how much to keep on hand, and when to update.</p> <p>Incorporate into new employee orientation.</p>
<p><b>Records/Documentation needs:</b></p> <p>Provide and keep reports of any suspected intentional contamination incident.</p> <p>Include Food Defense Incident Response Plan in your Standard Operating Procedures Manual</p> <p>Other:</p>	<p>Provide forms in accessible location for use in an event</p> <p>Incorporate</p>



# INCIDENT RESPONSE

## STEP C

### RESPONDING TO AN INTENTIONAL FOOD CONTAMINATION EVENT

Your restaurant should have procedures in place to respond to an intentional food contamination event. Employee training, knowing who to contact in an emergency, and how to protect your customers and staff will help avoid confusion in the event of a food contamination attack.

Depending on where the suspect has been and what foods may have been exposed to tampering, you may need to close portions of the operation or the entire restaurant.

An orange Contaminated Food sign is included in the back pocket of this toolkit to identify potentially contaminated foods. Forbid entry into the area where the suspected food is by cordoning it off, or station an employee there to prevent entry.

A Suspected Contamination Incident Report is included in the appendix of this toolkit to guide you in determining what may be important information to collect.

Hang the Emergency Response poster (example on page 42) from the back pocket of the toolkit in a visible location in your kitchen, so that staff can refer to it in an emergency.

### IMPORTANT CONTACT NUMBERS:

#### ✓ **LAW ENFORCEMENT**

- **Call 911** in a life-threatening situation: If people are showing illness, suspect is threatening others, or staff and/or customers are in life-threatening situation.
- **Call (503) 823-3333** Multnomah County Sheriff/Portland Police, for non-life threatening intentional food contamination incidents.

#### ✓ **HEALTH DEPARTMENT**

- **Call the Health Department (503) 988-3400** if contaminated food may have been served to people.

# INTENTIONAL FOOD CONTAMINATION RESPONSE PROTOCOL

## STEP 1

### RESTAURANT OR CUSTOMER IDENTIFIES CONTAMINATION

Food identified as being intentionally contaminated

OR

Product is suspected to have been contaminated through criminal activities

## STEP 2

### RESTAURANT REPORTS INCIDENT TO APPROPRIATE OFFICIALS

- ✓ **LAW ENFORCEMENT**
  - **Call 911** in a life-threatening situation: If people are showing illness, suspect is threatening others, or staff and/or customers are in life-threatening situation.
  - **Call (503) 823-3333** Multnomah County Sheriff/Portland Police, for non-life threatening intentional food contamination incidents.
- ✓ **HEALTH DEPARTMENT**
  - **Call the Health Department (503) 988-3400** if contaminated food may have been served to people.

## STEP 3

### RESTAURANT PREVENTS FURTHER ILLNESS/INJURY

- Do not allow staff or customers to disturb suspected food.
- Isolate area around suspected food from staff and customers (e.g. close doors, tape/seal off area, remove people from area)
- Forbid entry into area. (Consider using "Contaminated Food sign included in appendix of toolkit.)

## STEP 4

### LAW ENFORCEMENT/HEALTH DEPARTMENT OFFICIALS DETERMINE NECESSARY ACTIONS

- Suspect foods tagged and secured by proper authority (Police, FBI)
- Disposition of suspect foods determined (Police, FBI, Health Department)
- Inform restaurant of further actions needed (Police, FBI, Health department (such as order release, continue to hold food, issue destruction order)

# Food Emergency Communication System

In addition to this Food Defense Toolkit, our Food and Drug Administration grant provided Multnomah County Environmental Health the opportunity to acquire and implement a Food (Food Safety and Food Defense) Emergency Communication System. The system is designed to provide restaurants with emergency food related information through multiple technologies so that our food safety/food defense efforts are coordinated and timely. The Food Emergency Communication System includes the following technologies:

- **Robo-calling (aka blast phone calling) system:** We now have the capability to call all 2900+ restaurants in Multnomah County with an automated message to inform them of food recall, intentional contamination and/or food related emergency/disaster information.
- **Restaurant email list-serve:** We will send out an email to all restaurants that have email capability to notify them of recall, intentional contamination and/or food related emergency/disaster information.
- **Food Safety Hotline (503) 988 - 3663 x 24662:** Updated food recall, intentional contamination and food related emergency/disaster information will be available on our hotline. Restaurants will be able to access the hotline any time via phone during a food related emergency situation. The information provided on the hotline will be available in English and Spanish. This is an information line only, so callers will be unable to talk to a live person or leave a message.
- **Quarterly Food Safety Newsletter:** We will send restaurants a quarterly electronic food safety newsletter including the latest food safety news, trends, and/or rules. The newsletter will be sent via email to our restaurant list-serve.

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## WHAT RESTAURANT OPERATORS CAN DO TO ENSURE THAT THE FOOD EMERGENCY COMMUNICATION SYSTEM WORKS AND IS BENEFICIAL TO YOUR RESTAURANT

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- 1) **Provide your Health Inspector with your restaurant's emergency contact phone number.**  
During your semi-annual inspection, please inform and/or confirm with your Health Inspector your current emergency phone contact number. If your phone number changes between inspections, please contact your Health Inspector and update it.
- 2) **Provide your Health Inspector with your restaurant's emergency contact email address**  
so that we can include you in our restaurant list-serve. During your semi-annual inspection, please inform and/or confirm with your Health Inspector your current emergency contact email address. If your email changes between inspections, please contact your Health Inspector and inform them of your new address.
- 3) **Implement emergency response activities:** If you receive emergency information via one of these above mentioned technologies, implement the emergency response activities communicated to you in the message.
- 4) **Train your staff** on the Emergency Communication System so that they are aware of this system, would recognize a communication if it came to your facility, and can implement a response.

**PLEASE POST THIS NOTICE IN A VISIBLE LOCATION IN THE KITCHEN**

# **IF YOU SUSPECT FOOD HAS BEEN INTENTIONALLY CONTAMINATED:**

Notify Manager \_\_\_\_\_  
*Name & phone*

Isolate area around suspected food from staff and customers (e.g. close doors, tape/seal off area, remove people from area)

Do not disturb food.

- Call 911 in a life-threatening situation if people are showing illness, suspect is threatening the staff and/or customers are in life-threatening situation.
- Call (503) 823-3333 Multnomah County Sheriff/Portland Police, for non-life threatening intentional food contamination incidents.
- Call the Health Department (503) 988-3400 if contaminated food may have been served to people.

THE ADDRESS AND CROSS STREETS OF THIS RESTAURANT:

Address:

Cross Streets:

## **HOW TO REPORT AN EMERGENCY:**

- SPEAK SLOWLY AND CLEARLY
- STATE YOUR NAME
- DESCRIBE THE EMERGENCY:
  - What happened?
  - Where did it happen?
  - Who is involved?
- STAY ON THE PHONE



MULTNOMAH COUNTY  
HEALTH DEPARTMENT



Public Health  
Prevent. Promote. Protect.

# Suspected Contamination Incident Report

## 1. Describe event:

Please use the figure to note details of suspect's appearance.



Witnesses: Name	Numbers

License number of suspect's vehicle? \_\_\_\_\_

Other people associated with the attack? \_\_\_\_\_

Food product suspected to have been contaminated? \_\_\_\_\_

When was this product made? \_\_\_\_\_

Location of incident: \_\_\_\_\_

How did you learn of the incident? \_\_\_\_\_

Was there video surveillance? \_\_\_\_\_

Any known agent used? \_\_\_\_\_

Suspect's observed activities \_\_\_\_\_

2. Date: \_\_\_\_\_ Time of incident: \_\_\_\_\_ am pm

3. Did manager close restaurant due to incident?

☐ Yes ☐ No

☐ Suspect food isolated and protected from disturbance?

5. Notification/Reporting of incident:

☐ Life threatening situation: **911**

☐ Portland Police: **(503) 823-3333**

☐ Health Department: **(503) 988-3400**  
(if food may have been served to people)

☐ Restaurant owner/management:

☐ Other: \_\_\_\_\_

Person completing this report: \_\_\_\_\_

THIS AREA CONTAINS POTENTIALLY  
HAZARDOUS OR TOXIC FOODS

**DO NOT ENTER!**



CONTAMINATED  
FOOD

----- FOLD HERE TO HANG ON BANNER MADE FROM TAPE OR CORD -----

CONTAMINATED  
FOOD



**DO NOT ENTER!**

THIS AREA CONTAINS POTENTIALLY  
HAZARDOUS OR TOXIC FOODS



# MANAGEMENT AND EMPLOYEE TRAINING

## STEP D

### TRAIN STAFF IN FOOD DEFENSE PRINCIPLES

Consider using the Employee Training Handout, (sample on the next page, reproducible version in the appendix) and the enclosed DVD, “Employees are the First Line of Food Defense” as staff training tools. There is also a poster titled “Who is Touching Your Food?” that can be hung in an area where employees congregate. If you ask employees to sign and date the training handout to file with their records, please make sure you give them a copy of to take with them for later review.





# FOOD DEFENSE

## TRAINING FOR RESTAURANT EMPLOYEES

**Food Safety** prevents accidental contamination of food and food contact surfaces by making sure that food preparation areas are clean and sanitary and that hot foods are kept hot, cold foods are kept cold, and foods that should not mix do not mix.

**Food Defense** prevents someone from contaminating food on purpose by attacking restaurant food with germs or viruses, hazardous materials or toxic chemicals.

Although intentional contamination events have been rare in the US, an act of food terrorism could hurt our communities by making people sick or even killing them or by making the public lose trust in local businesses.

### *Food Terrorism in History*

**1984** Members of a cult headed by Bhagwan Rajin used activated Salmonella bacteria to contaminate restaurant salad bars in Wasco county and to infect more than 750 individuals in the hopes of affecting the outcome of a presidential election. There were no fatalities.

**1996** A former laboratory worker was guilty to contaminating a tray of doughnuts and muffins with the foodborne pathogen *Escherichia coli* O157:H7. The employee used an unoccupied supervisor's computer to send out an email invitation for forty-five other employees to enjoy pastries in the employee break room. Twelve of the forty-five employees ate some of the pastry and eventually contracted severe gastrointestinal illness. Four of those employees required hospitalization but there were no fatalities. The origin of the pathogen was the laboratory itself, and the opportunity made it possible for this intentional contamination to occur.

**2003** A Michigan supermarket employee was indicted for intentionally contaminating 200 pounds of ground beef with a nicotine-based pesticide. The CDC reported that 92 individuals became ill after consuming the ground beef.

**2005** A New York McDonald's employee was arrested in a sting operation at the restaurant where a police officer had bitten into a burger filled with shards of glass a few hours earlier. The officer suffered cuts to his mouth and throat.

**Call 911** in a life-threatening situation: If people are showing illness, suspect is threatening others, or staff and/or customers are in life-threatening situation.

**Call (503) 823-3333** Multnomah County Sheriff/Portland Police, for non-life threatening intentional food contamination incidents.

**Call the Health Department (503) 988-3400** if contaminated food may have been served to people.

## Your Duties as an Employee: \_\_\_\_\_

- Be observant and aware of any suspicious looking activity at all times. Customers, visitors friends, inspectors, fellow employees, service and delivery people can all pose a threat of intentional contamination.
- Do not allow unknown people into food preparation and service areas without proper identification or management approval.
- Monitor public areas for suspicious activities or loitering.
- Monitor self-service areas (salad bars, buffet lines, grab and go bins) for tampering and be aware of anyone lingering around.
- Keep personal items away from food prep and dishwashing areas.
- Use your badge, nametag, or uniform if one is provided.
- Notify your manager immediately if you notice any suspicious activity, or experience symptoms of illness.
- Examine ingredients before using them. Do not use food that has an unusual look or smell.
- Keep locked areas locked.
- Make sure all deliveries are attended,
- Check the identification of vendors and service workers.
- Store all cleaning products and other chemicals away from food.
- Know what your restaurant's food safety policies are.
- Understand how the Massachusetts Environmental Health Services Food Emergency Communication System works and with restaurant management support, be able to implement emergency procedures (see Food Emergency Communication System description on page 41).

### STEPS TO TAKE IF YOU OBSERVE A POTENTIAL CONTAMINATION INCIDENT:

1. Mentally note a description of suspect and suspicious activity or methods used, such as wearing protective gear or gloves, using a spray, powder, or probe, etc.
2. Do not disturb the food in any way. Do not go near the suspected food.
3. Immediately notify the manager or person-in-charge. They should isolate food from staff and customers. If no manager is available, contact the Health Department for guidance (503) 988-3400.

**IF YOU  
SEE SOMEONE  
CONTAMINATING  
FOOD OR ACTING  
SUSPICIOUSLY, PROTECT  
YOURSELF AND OTHERS.  
CONTACT A MANAGER  
IMMEDIATELY.**

By signing below, I agree that I have read and understand the above Food Defense information.

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Manager: Please photocopy this form and provide the copy to the employee signing above.**

# *Food Defense Training for Managers*

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- 1) Review historical cases of intentional food contamination (pg. 6)
- 2) Establish location of this tool kit for quick reference
- 3) Understand responsibilities of managers/person-in-charge and of employees on food defense
- 4) Know procedures for isolating food from staff and customers
- 5) Know procedure for reporting a Food Defense incident to the proper authorities, and know how to complete a "Suspected Contamination Incident Report Form" (page 43).
- 6) Know procedures for approaching suspects of intentional food contamination – may be different depending on whether it is a customer, employee, terrorist, or service personnel
- 7) Be able to train employees and answer questions on food defense. Consider using training handout in appendix and the enclosed DVD "Employees are the First Line of Food Defense."
- 8) Hang Employee Awareness Poster in a break area (included in appendix)
- 9) Know and understand how the Food Emergency Communication System works, and what your role is to help implement it. (*see Food Emergency Communication System description on page 41*).
- 10) Train your staff on the Food Emergency Communication System so that they can recognize emergency communications and know what to do.

# Training DVD:

## Employees are the First Line of Food Defense

*(DVD is included as an appendix in the binder pocket)*

This 12 minute DVD was produced by the FDA as part of a larger, industry-wide Food Defense initiative, and is therefore not designed specifically for restaurant employees.

Nevertheless, we find the DVD to be entertaining and easily accessible to most employees. It offers a brief introduction to the essential concepts of Food Defense, as well as activities employees can implement to prevent intentional food contamination.

If you have misplaced the DVD we included in this kit, the video is also available online at:  
[www.cfsan.fda.gov/~comm/vlwfirst.html](http://www.cfsan.fda.gov/~comm/vlwfirst.html)



**MULTNOMAH COUNTY  
FOOD SAFETY HOTLINE  
(503) 988-3663 ext. 24662**

*Disponible en Español*

**Current, local information about:**

- Food Recalls
- Intentional Contamination Events
- Emergencies





**IF YOU SEE OR SUSPECT FOOD HAS BEEN CONTAMINATED, PROTECT YOURSELF AND OTHERS. CONTACT A MANAGER IMMEDIATELY.**

- ✓ Do not allow customers into food prep and dishwashing areas.
- ✓ Monitor public areas for suspicious activities or lingering.
- ✓ Monitor areas where customers grab and go bins) for suspicious activity, be aware of anyone lingering around.
- ✓ Keep personal items away from food prep and dishwashing areas.
- ✓ Use your name tag, or uniform if one is provided.
- ✓ Notify your manager immediately if you notice any suspicious activity or experience symptoms of illness.
- ✓ Examine ingredients before using them, and avoid food that has an unusual look or smell.
- ✓ Keep locked areas locked.
- ✓ Make sure all deliveries are attended.
- ✓ Check the identification of vendors and service workers.
- ✓ Store all cleaning products and other chemicals away from food.
- ✓ Know what your restaurant's food defense plan is.

**IF PEOPLE ARE SHOWING ILLNESS OR SUSPECT IS THREATENING OTHERS, CALL 911**

For all other intentional food contamination incidents, call law enforcement, stating you believe there has been an intentional poisoning of food. Multnomah County Sheriff's Office/Portland Police (503) 823-3333

If contaminated food may have been served to people, call the Health Department, Multnomah County Environmental Health (503) 988-3400





# *Appendices*

- **FOOD DEFENSE WORK PLAN**
- **CONTAMINATED FOOD ISOLATION SIGN**
- **SUSPECTED CONTAMINATION INCIDENT REPORT FORMS**
- **EMERGENCY RESPONSE POSTER**
- **EMPLOYEE FOOD DEFENSE AWARENESS POSTER**
- **FOOD BORNE ILLNESS AWARENESS POSTER**
- **FDA TRAINING DVD: EMPLOYEES ARE THE FIRST LINE OF FOOD DEFENSE**
- **EMPLOYEE TRAINING HANDOUT**

# Food Defense Work Plan

Vulnerability	Policy/Procedure	Date in Effect
1. Access to kitchen		
2. Loitering		
3. Building Security		
4. Food Deliveries		
5. Self-Service		
6. Employee Training		
7. Manager Training		
8. Contaminated Food	<i>(See Incident Response Plan)</i>	

**THIS AREA CONTAINS POTENTIALLY  
HAZARDOUS OR TOXIC FOODS**

**DO NOT ENTER!**



**CONTAMINATED  
FOOD**

----- FOLD HERE AND HANG OVER BARRIER MADE FROM TAPE OR CORD -----

**CONTAMINATED  
FOOD**



**DO NOT ENTER!**

**THIS AREA CONTAINS POTENTIALLY  
HAZARDOUS OR TOXIC FOODS**

# Suspected Contamination Incident Report

## 1. Describe event:

Please use the figure to note details of suspect's appearance.



Witnesses: Names	Phone Numbers

License number of suspect's vehicle? \_\_\_\_\_

Other people associated with the attack? \_\_\_\_\_

Food product suspected to have been contaminated? \_\_\_\_\_

When was this product made? \_\_\_\_\_

Location of incident: \_\_\_\_\_

How did you learn of the incident? \_\_\_\_\_

Was there video surveillance? \_\_\_\_\_

Any known agent used? \_\_\_\_\_

Suspect's observed activities \_\_\_\_\_

2. Date: \_\_\_\_\_ Time of incident: \_\_\_\_\_ am pm

3. Did manager close restaurant due to incident?

☐ Yes ☐ No

☐ Suspect food isolated and protected from disturbance?

5. Notification/Reporting of incident:

☐ Life threatening situation: **911**

☐ Portland Police: **(503) 823-3333**

☐ Health Department: **(503) 988-3400**  
(if food may have been served to people)

☐ Restaurant owner/management:

☐ Other: \_\_\_\_\_

Person completing this report: \_\_\_\_\_

**PLEASE POST THIS NOTICE IN A VISIBLE LOCATION IN THE KITCHEN**

# **IF YOU SUSPECT FOOD HAS BEEN INTENTIONALLY CONTAMINATED:**

Notify Manager \_\_\_\_\_  
*Name & phone*

Isolate area around suspected food from staff and customers (e.g. close doors, tape/seal off area, remove people from area)

Do not disturb food.

- Call 911 in a life-threatening situation: if people are showing illness, suspect is threatening others, or staff and/or customers are in life-threatening situation.
- Call (503) 823-3333 Multnomah County Sheriff/Portland Police, for non-life threatening intentional food contamination incidents.
- Call the Health Department (503) 988-3400 if contaminated food may have been served to people.

THE ADDRESS AND CROSS STREETS OF THIS RESTAURANT:

Address:

Cross Streets:

## **HOW TO REPORT AN EMERGENCY:**

- SPEAK SLOWLY AND CLEARLY
- DESCRIBE THE EMERGENCY:  
What happened?  
Where did it happen?  
Who is involved?
- STATE YOUR NAME
- STAY ON THE PHONE



**MULTNOMAH COUNTY  
HEALTH DEPARTMENT**



**Public Health**  
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# WHO IS TOUCHING **YOUR** FOOD?



**IF YOU SEE OR SUSPECT FOOD HAS BEEN CONTAMINATED, PROTECT YOURSELF AND OTHERS. CONTACT A MANAGER IMMEDIATELY.**

- ✓ Do not allow customers into food prep and dishwashing areas.
- ✓ Monitor public areas for suspicious activities or loitering.
- ✓ Monitor self-service areas (salad bars, grab and go bins) for tampering, and be aware of anyone lingering around.
- ✓ Keep personal items away from food prep and dishwashing areas.
- ✓ Use your badge, nametag, or uniform if one is provided.
- ✓ Notify your manager immediately if you notice any suspicious activity, or experience symptoms of illness.
- ✓ Examine ingredients before using them, don't use food that has an unusual look or smell.
- ✓ Keep locked areas locked.
- ✓ Make sure all deliveries are attended.
- ✓ Check the identification of vendors and service workers.
- ✓ Store all cleaning products and other chemicals away from food.
- ✓ Know what your restaurant's food defense plan is.

**IF PEOPLE ARE SHOWING ILLNESS OR SUSPECT IS THREATENING OTHERS, CALL 911**

For all other intentional food contamination incidents, call law enforcement, stating you believe there has been an intentional poisoning of food. Multnomah County Sheriff's Office/Portland Police (503) 823-3333

If contaminated food may have been served to people, call the Health Department, Multnomah County Environmental Health (503) 988-3400

# **THIS RESTAURANT IS AWARE OF THE CURRENT PEANUT BUTTER CONTAMINATION OUTBREAK**

**SAMPLE  
POSTER**

## **WE ARE NOT USING AFFECTED PRODUCTS IN OUR KITCHEN**

**RECALL DATE: 3/18/08**



**MULTNOMAH COUNTY  
HEALTH DEPARTMENT**



**Public Health**  
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**You can find a customizable version of this poster (and the whole Food Defense toolkit) on the internet at [www.mchealthinspect.org](http://www.mchealthinspect.org)**

# FOOD DEFENSE

## TRAINING FOR RESTAURANT EMPLOYEES

**Food Safety** prevents accidental contamination of food and food contact surfaces by making sure that food preparation areas are clean and sanitary and that hot foods are kept hot, cold foods are kept cold, and foods that should not mix do not mix..

**Food Defense** prevents someone from contaminating food on purpose by attacking restaurant food with germs or viruses, hazardous materials or toxic chemicals.

Although intentional contamination events have been rare in the US, an act of food terrorism could hurt our communities by making people sick or even killing them or by making the public lose trust in local businesses.

### *Food Terrorism in History*

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**1984** Members of a cult headed by Bhagwan Shree Rajneesh used cultivated Salmonella bacteria to contaminate restaurant salad bars in Wasco county Oregon (the Dalles), infecting more than 750 individuals in the hopes of affecting the outcome of a local election. Fortunately, there were no fatalities.

**1996** A former laboratory employee pled guilty to contaminating a tray of doughnuts and muffins with the foodborne pathogen Shigella dysenteriae Type 2. The employee used an unoccupied supervisor's computer to send out an email inviting forty-five other lab workers to enjoy pastries in the employee break room. Twelve of the forty-five employees ate some amount of a pastry and eventually contracted severe gastrointestinal illness. Four of those employees required hospitalization but there were no fatalities. The origin of the pathogen was the laboratory itself, and lax security made it possible for this intentional contamination to occur.

**2003** A Michigan supermarket employee was indicted for intentionally contaminating 200 pounds of ground beef with a nicotine-based pesticide. The CDC reported that 92 individuals became ill after consuming the ground beef.

**2005** A New York McDonald's employee was arrested in a sting operation at the restaurant where a police officer had bitten into a burger filled with shards of glass a few hours earlier. The officer suffered cuts to his mouth and throat.

**Call 911** in a life-threatening situation: If people are showing illness, suspect is threatening others, or staff and/or customers are in life-threatening situation.

**Call (503) 823-3333** Multnomah County Sheriff/Portland Police, for non-life threatening intentional food contamination incidents.

**Call the Health Department (503) 988-3400** if contaminated food may have been served to people.



## *Your Duties as an Employee:*

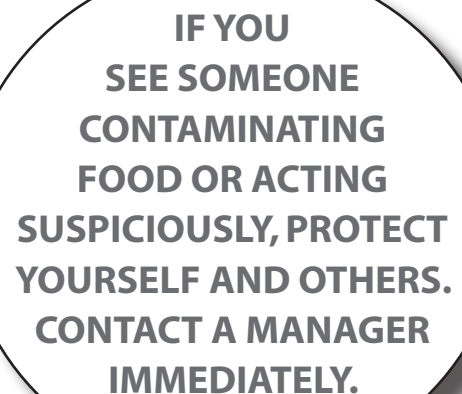
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- Be observant and aware of any suspicious looking activity at all times. Customers, visitors friends, inspectors, fellow employees, service and delivery people can all pose a threat of intentional contamination.
- Do not allow unknown people into food preparation and service areas without proper identification or management approval.
- Monitor public areas for suspicious activities or loitering.
- Monitor self-service areas (salad bars, buffet lines, grab and go bins) for tampering and be aware of anyone lingering around.
- Keep personal items away from food prep and dishwashing areas.
- Use your badge, nametag, or uniform if one is provided.
- Notify your manager immediately if you notice any suspicious activity, or experience symptoms of illness.
- Examine ingredients before using them. Do not use food that has an unusual look or smell.
- Keep locked areas locked.
- Make sure all deliveries are attended,
- Check the identification of vendors and service workers.
- Store all cleaning products and other chemicals away from food.
- Know what your restaurant's food defense plan is.
- Understand how the Multnomah County Environmental Health Services Food Emergency Communication System works and with restaurant management support, be able to implement emergency response activities (see Food Emergency Communication System description on page 41).

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### **STEPS TO TAKE IF YOU OBSERVE A POTENTIAL CONTAMINATION INCIDENT:**

1. Mentally note description of suspect and suspicious activity or methods used, such as wearing protective gear or gloves, using a spray, powder, or probe, etc.
2. Do not disturb the food in any way. Do not go near the suspected food.
3. Immediately notify the manager or person-in-charge. They should isolate food from staff and customers. If no manager is available, contact the Health Department for guidance (503) 988-3400.



**IF YOU  
SEE SOMEONE  
CONTAMINATING  
FOOD OR ACTING  
SUSPICIOUSLY, PROTECT  
YOURSELF AND OTHERS.  
CONTACT A MANAGER  
IMMEDIATELY.**

---

By signing below, I agree that I have read and understand the above Food Defense information.

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Manager: Please photocopy this form and provide the copy to the employee signing above.**

# Food Defense Tool Kit Evaluation

## 1. What part of the Food Defense tool kit was **easy** to understand and use?

- ☐ Front page check list
- ☐ Definitions/History
- ☐ Restaurant Vulnerability Assessment
- ☐ Risk Control instructions and samples
- ☐ Risk Control Plan
- ☐ Responding to an Event instructions and sample
- ☐ Incident Response Plan
- ☐ Contaminated Food Label
- ☐ Suspected Contamination Incident Report
- ☐ Poster
- ☐ Training for employees
- ☐ Training for managers

Comments/suggestions:

## 2. What part of the Food Defense tool kit was **hard** to follow and use?

- ☐ Front page check list
- ☐ Definitions/History
- ☐ Restaurant Vulnerability Assessment
- ☐ Risk Control instructions and samples
- ☐ Risk Control Plan
- ☐ Responding to an Event instructions and sample
- ☐ Incident Response Plan
- ☐ Contaminated Food Label
- ☐ Suspected Contamination Incident Report
- ☐ Poster
- ☐ Training for employees
- ☐ Training for managers

Comments/suggestions:

## 3. How easy or difficult was it to find materials you were looking for?

(very user-friendly)    **1**       **2**       **3**       **4**       **5**    (too complicated)

Cont'd on next page

# Food Defense Tool Kit Evaluation *cont'd*

4. How user friendly was the manual?

(very user-friendly)    1       2       3       4       5    (too complicated)

5. Have you created a Food Defense Plan for your restaurant?

☐ Yes                      ☐ No

6. Which of the 8 risks did you decide to address in your Food Defense plan?

- |  |   |
|--|---|
| <input type="checkbox"/> Access to Kitchen | <input type="checkbox"/> Employee Training  |
| <input type="checkbox"/> Loitering         | <input type="checkbox"/> Manager Training   |
| <input type="checkbox"/> Food Deliveries   | <input type="checkbox"/> Contaminated Foods |
| <input type="checkbox"/> Self Service      |   |

7. Have you done any Food Defense training with your staff?

☐ Yes                      ☐ No

8. Have you called the Multnomah County Food Safety Hotline  
[(503) 988 -3663 x 24662] to receive food recall or food safety information?

☐ Yes                      ☐ No

9. Have you received an email message about a recall or food safety concern  
from Multnomah County?

☐ Yes                      ☐ No

Please provide your desired emergency contact e-mail address \_\_\_\_\_

10. Have you received an automated phone call message about a food recall or  
food safety concern from Multnomah County?

☐ Yes                      ☐ No

11. Is the food safety information received helpful to your restaurant?

Not Helpful                      Somewhat Helpful                      Helpful

12. What method of emergency communication would be most desirable?

Email                      Automated Phone Message                      Call hotline #

# FOOD DEFENSE Toolkit for Restaurants



**Public Health**  
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# FOOD DEFENSE Toolkit for Restaurants



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