



***The time is
right for
promoting
biosecurity
for the feed
industry.***

**American Feed
Industry Association**
1501 Wilson Boulevard
Suite 1100
Arlington, VA 22209-2403
Tel: 703/524-0810
Fax: 703/524-1921
www.afia.org

American Feed Industry Association Guide to Biosecurity Awareness

Introduction

In response to potential attacks on the safety of the nation's food supply, the Departments of Agriculture and Health and Human Services have requested that industry leaders involved in animal agriculture assume a leading role in raising biosecurity awareness. Grain, processed ingredients, animal feed, pet food and their delivery vehicles all serve as potential vectors for intentional contamination, resulting in injury to humans and animals.

One should not assume that consumers are a terrorist's sole targets. Terrorists may also cause severe economic hardship and market disruptions by damaging production assets and distribution methods.

The time is right for promoting biosecurity for the feed industry. AFIA offers this publication as a guide to biosecurity awareness. It is not intended as an operational manual and is not a substitute for good manufacturing practices. Instead, this publication is a tool toward strengthening companies' overall feed/food safety plans.

Each employee has a role in assuring the quality of manufactured products. Starting with top management, the message must be conveyed that all employees should remain vigilant in protecting a company's assets and reputation. Consider conducting employee-training meetings using this guide and the related PowerPoint™ presentation, available at www.afia.org

In the event of an attack upon its facility, a company should contact law enforcement authorities immediately. AFIA stands ready to assist any company should such an unfortunate event occur. AFIA will also serve as a clearinghouse of information to enable others to quickly protect industry assets. Collectively, AFIA and the industry can help insure the safety of our nation's food supply by continuing to provide safe feed, while maintaining a safe work environment.

Threats to Biosecurity

Certain safe substances may be used to produce unsafe or harmful combinations if used incorrectly or indiscriminately. These include ammonium nitrate or urea fertilizer, concentrated pesticides and animal drugs. Secure and account for such products and report anyone acting suspiciously or wishing to purchase abnormal quantities.

Generally, feed and feed ingredients may become adulterated by the following means:

- ▶ Biological (bacteria, toxins, viruses, parasites, etc.)
- ▶ Chemical (classical chemical warfare agents, such as nerve, blister, blood and choking, and toxic industrial chemicals, such as pesticides, rodenticides and heavy metals)
- ▶ Radiological (agents that can be delivered in liquid or solid form)
- ▶ Physical (e.g. ferrous and non-ferrous metal, glass and plastic)

Any biosecurity program should anticipate attempts to introduce these agents into the animal feed production and distribution process.

Facility Security

Ensuring the physical security of buildings and grounds is an important step in overall biosecurity. A conscious effort should be taken to assess and control security risks by recognizing and anticipating security issues before they surface.

- ▶ Consider using security lighting, perimeter fencing, and controlled gate access. Depending upon the size of the property and type of business, an off-hours security guard may be warranted.
- ▶ Use electronic security devices, such as motion detectors, door alarms, video cameras and alarms linked to an off-site security system as effective deterrents.
- ▶ Make certain door hardware is of industrial design.
- ▶ Install guards on exterior ladders, protecting them from unauthorized use and preventing access to the top of bulk storage tanks. Discharge gates of all bins should be electronically or mechanically secured to prevent unauthorized release.
- ▶ Padlock entry and discharge points of exterior liquid tanks (above and below ground) when not in use.
- ▶ Provide additional security by employing secured covers over outside receiving pits.
- ▶ Lock all vehicles parked outside at night or during non-business hours.
- ▶ Secure or park containers inside, whether they are empty or loaded with product.
- ▶ Request local law enforcement to patrol company premises on a regular, but unpredictable basis. A facility that “looks” secure will frequently discourage the casual prankster.
- ▶ Encourage employees to report suspicious behavior. Employees can assist in protecting the company’s assets and its reputation, and in ensuring uninterrupted operations and service.
- ▶ Restrict access to computer process control and data systems, secure on-line communications, and safeguard them with virus protection. Store back-ups off-site.
- ▶ Emphasize security when in new construction planning and design.

- ▶ Limit access to other areas of the property by designating a specific area for visitor parking.
- ▶ Maintain a record of individuals’ names and companies, arrival and departure times, and purposes of the visit.
- ▶ Use visitor badges or identification cards.
- ▶ Do not allow visitors, including delivery personnel, contract providers and service support, to wander the premises. A company representative should serve as escort at all times.
- ▶ Restrict access to key manufacturing areas.

Ingredient Integrity

An important component in feed biosecurity is ensuring that all feed ingredients are safe.

- ▶ Purchase only from an approved-list of suppliers.
- ▶ Visit new suppliers, request samples and lab analysis, review their quality programs and procedures for positive product identification, their relationships with contract haulers, and product security during transport.
- ▶ Label and use in accordance with federal and state regulations only approved ingredients for feed production.
- ▶ Have the supplier or transportation company certify that the container is clean before loading. No hazardous materials may be hauled prior to, or in combination with, feed ingredients.
- ▶ Secure truck trailers, both bag and bulk, once loaded. In the case of soft-top trailers, measures should be taken to prevent unauthorized persons from accessing and adulterating the shipments.
- ▶ Secure rail car hatches and discharge gates. When using seals, record the seal numbers on the bill of lading. Upon receipt, verify the seal numbers.
- ▶ Inspect packaged products for seal tampering.

Visitor Policy

All visitors should check in with a designated company representative. This procedure protects against unwanted visitors and helps account for all persons during an emergency.

- ▶ Post signs informing visitors where to report.



- ▶ Take, inspect for known physical characteristics and retain samples prior to and during unloading.
- ▶ Maintain a receiving log for all receipts, including rejected items.

Product Integrity

Protect the integrity of products during production and while being prepared for shipment.

- ▶ Sample products and inspect them for known characteristics.
- ▶ Generate records sufficient to allow traceability of ingredients through production.

Distribution

Certain precautions should be implemented to further protect product integrity and ensure safe delivery to customers.

- ▶ Inspect thoroughly, prior to loading, the bulk container for foreign and/or suspicious material. Confirmation of what was previously hauled is essential. Special cleaning or sequencing procedures may be warranted.
- ▶ Verify that all customer pick-up drivers are actually representatives of the customer.
- ▶ Inspect visually the product stream to confirm quality and consistency. Take and retain samples.
- ▶ Secure all container access and discharge points after loading. If seals are used, document the seal numbers on the shipping papers. Do not leave soft-top trailers unattended.
- ▶ Use shipping documents to identify the contents of each compartment, along with an official label for each product. In the case of rail shipments, immediately mail or electronically send shipping papers to the customer.
- ▶ Maintain a shipping log.

- ▶ Implement a bio-sanitation program to prevent the spread of disease from farm-to-farm. Procedures to disinfect vehicles and drivers entering and leaving each delivery point may be dictated by the customer or by federal or state officials.

Product Recall

Every company should have a comprehensive and tested recall program that is specific to its operations and products.

- ▶ Identify the hazard and its potential to injure humans and/or animals.
- ▶ Notify immediately all locations where the product was shipped. Contact the sellers and ask them to identify and inform all consumers receiving the product if it has already been sold.
- ▶ Make provisions for the return of any necessary product.
- ▶ Ascertain carefully if returned goods can be remanufactured or must be discarded.
- ▶ Notify government agencies and law enforcement, if warranted.
- ▶ Assemble an accurate record of what was produced, shipped and later accounted for and/or disposed.
- ▶ A 24-hour hotline number represents a responsive method to answer consumer questions.

Housekeeping

A written housekeeping program should be implemented for all areas of the facility, including grounds. The program might include the task, deadline and responsible party. Routine self-inspections and a written report will document performance.

A written pesticide and rodenticide program should also be implemented. If some or all applications are conducted by an outside service, the firm should provide documentation of its responsibilities and actions.



Employee Selection and Training

Biosecurity awareness should be instilled in all employees, starting with top management. Everyone must vigilantly monitor the activities of visitors, customers, service providers, and fellow employees.

- ▶ Ask applicants for a resume of qualifications and complete a job application.
- ▶ Conduct background checks (i.e., previous employers' references, and motor vehicle and police records) to establish a prospective employee's qualifications and demeanor.
- ▶ Consider conducting drug and alcohol testing during the final stages of the hiring process, after a current employee injury, and when an employee's fitness for duty is questionable. Check state restrictions prior to introducing a new substance abuse program.
- ▶ Institute an employment probationary period (60 – 90 days) to properly evaluate a new employee's work habits.
- ▶ Train employees to recognize and report suspicious individuals or abnormal activities, security breeches, suspicious materials or devices, and misplaced equipment.
- ▶ Communicate a clear zero tolerance policy for workplace violence and encourage employees to promptly report such incidents.
- ▶ Implement policies on appropriate personal protection equipment as dictated by management and required by law.

Emergency Response

During the initial stages of an emergency, some circumstances are difficult to control. Prepare and train all personnel to adequately respond to a crisis as calmly and safely as possible.

- ▶ Maintain a current inventory of all hazardous and flammable products.
- ▶ Create and post a list of all emergency contacts and information.
- ▶ Develop an action plan to respond to the discovery of highly suspicious substances or devices. The plan should provide for evacuating the area, contacting law enforcement, securing the scene and identifying witnesses.
- ▶ Generate and publicize an evacuation plan in the case of fires and explosions. This plan should include contacting emergency responders, fighting small fires, disconnecting electrical power and assisting authorities.
- ▶ Establish and maintain an up-to-date employee roster and visitor log to facilitate a thorough personnel head count at any appropriate time.
- ▶ Conduct evacuation and response drills, monitored periodically by the local fire department.
- ▶ Post a site plan depicting escape routes, rendezvous areas, and fire fighting and rescue equipment to provide employees a constant reminder of their assignments.

AFIA provides this guidance to raise the biosecurity awareness of everyone involved in animal agriculture. Please inform the association immediately if unfortunate situations occur. In turn, AFIA will share appropriate information with others so that the nation's safe and wholesome food supply remains protected.

The Biosecurity Awareness Guide was produced with the participation of the Animal Health Institute (AHI); the Center of Veterinary Medicine (CVM)/Food and Drug Administration (FDA); and the National Renderers Association (NRA). AFIA expresses gratitude to these organizations for serving on its biosecurity task force and contributing to the development of this important document.

American Feed Industry Association

1501 Wilson Boulevard, Suite 1100
Arlington, VA 22209-2403
Tel: 703/524-0810
Fax: 703/524-1921
www.afia.org