Encuentro Anual Industria de las Conservas

FOOD DEFENSE: Aspectos Generales

ACHIPIA
Ministerio de Agricultura

Gobierno de Chile

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MSc Nutrición y Alimentos
09 de Septiembre 2014

¿Qué es Food Defense?

- ✓ Conjunto de medidas/esfuerzos para prevenir la ***Contaminación intencional de alimentos,*** a través de peligros físicos, químicos, biológicos o radiológicos.

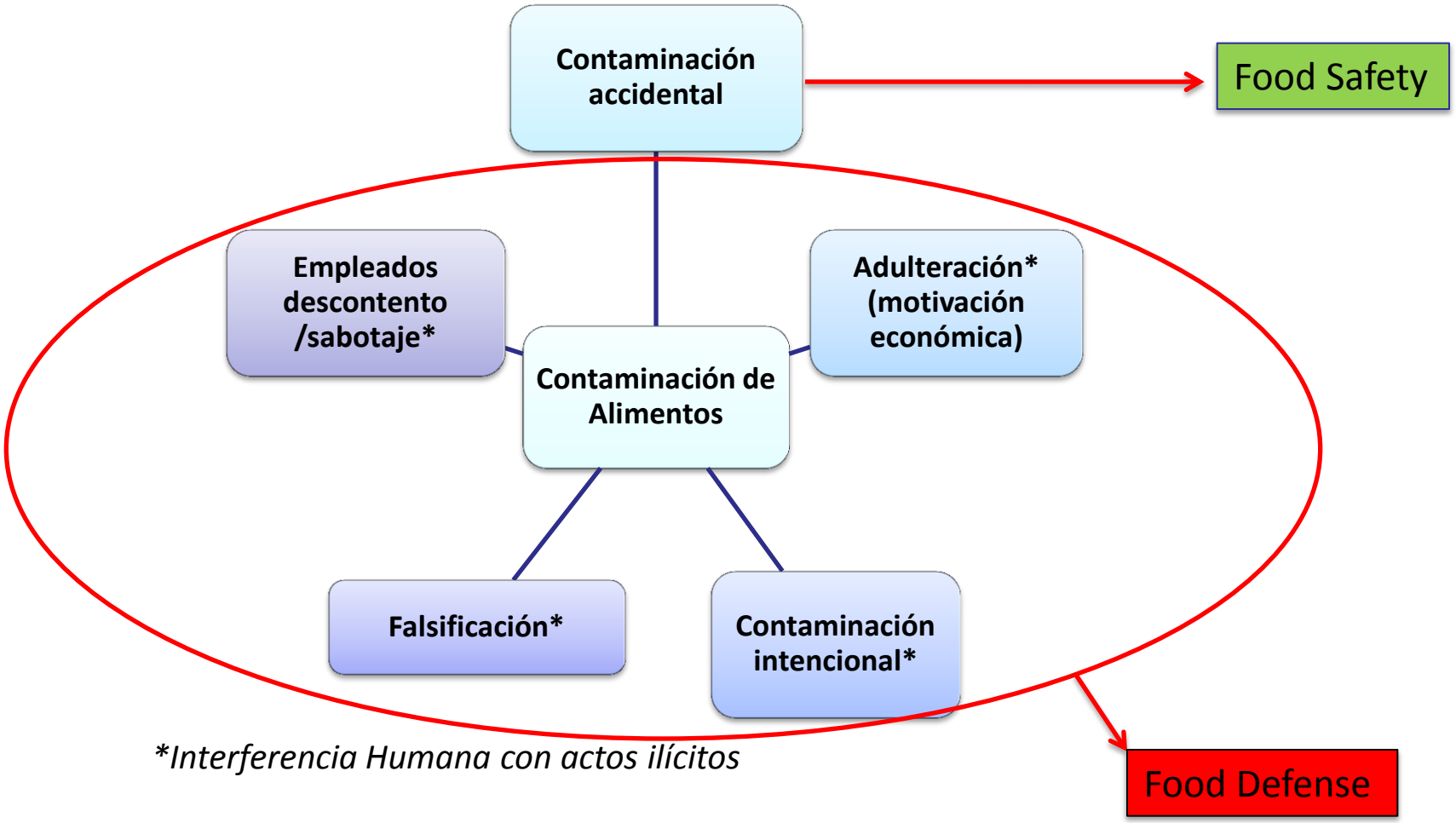
Contaminación intencional de alimentos

→ Perjudicar la imagen de una empresa.

→ Obtener beneficios económicos.

→ Causar daño potencial a la salud pública

Food Defense: Contaminación Intencional de Alimentos



**Interferencia Humana con actos ilícitos*

Food Safety - Food Defense

- ✓ Se asocian a un grupo de agentes tóxicos o mortales que no están asociados al proceso
- ✓ Presencia de contaminantes en altas cantidades/concentraciones
- ✓ Ocurrencia aleatoria/heterogénea
- ✓ Diferentes motivaciones
- ✓ Intencionado: Impredecible/ Prevención

Se utilizan herramientas y métodos de control comunes
En ambos casos hay resultado de enfermedades o muerte de personas

Food Defense: Contaminación intencional- Adulteración

¿Cuál es la preocupación?

Cadena Alimentaria

Insumos

Producción

Procesamiento

Comercialización

Consumo

La cadena de alimentos, es bastante dispersa por lo tanto se transforma en un objetivo vulnerable:

- ✓ Se pueden generar pérdidas humanas.
- ✓ Se pueden generar pérdidas económicas importantes
- ✓ Miedo generalizado en la población
- ✓ Pérdida de la confianza de los consumidores en el suministro de alimentos y en las autoridades
- ✓ Interrupción del comercio

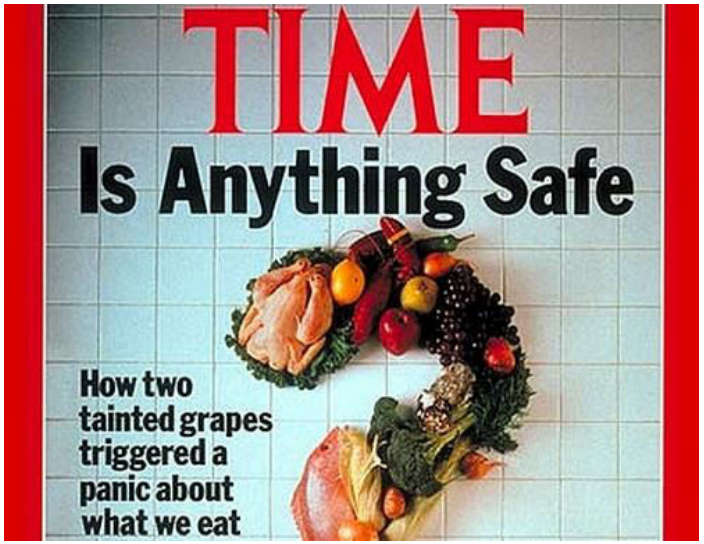
¿Cuál es la preocupación?

Globalización

De donde nace *Food Defense*?...

- ✓ 1978 , Naranjas con mercurio provenientes de Israel

- ✓ 1989 en el puerto de Filadelfia, USA: Uva de mesa con cianuro provenientes de Chile



De donde nace *Food Defense*?...

- ✓ El concepto de defensa alimentaria o *food defense,* adquiere mayor relevancia luego de los atentados del año 2001 en Estados Unidos.

11 de Septiembre

18 de Septiembre

Ley de Seguridad en la Salud Pública, Preparación y Respuesta contra el Bioterrorismo, más conocida como Ley contra el Bioterrorismo, firmada por el Presidente Bush el 12 de junio de 2002.

Normativa: Ley contra el bioterrorismo

La Ley contra el Bioterrorismo se encuentra estructurada en cinco títulos, divididos en subtítulos, y estos, a su vez, en secciones.

- ✓ Título I: *Preparación Nacional contra el Bioterrorismo y Otras Emergencias de Salud Pública*
- ✓ Título II: *Mejoramiento en el Control y Manejo de Agentes Biológicos Peligrosos y Toxinas*
- ✓ **Título III*: Protección e Inocuidad en el Suministro de Alimentos y Medicamentos***
- ✓ Título IV: *Protección en el Suministro de Agua Potable*
- ✓ Título V: *Consideraciones Finales*

Plan Food Defense

- ✓ Es un plan escrito donde se debe registrar las actividades implementadas para controlar y/o reducir el potencial de ocurrencia de un evento de contaminación intencional.

- ✓ Se debe documentar lo siguiente:
  - ✓ Análisis de peligros y evaluación de riesgos asociados a productos.
  - ✓ Análisis de peligros y evaluación de riesgos asociados a instalaciones y entorno.
  - ✓ Identificación de vulnerabilidades
  - ✓ Determinación de las medidas de control

- ✓ Debe incluir controles de toda la cadena alimentaria (personal, instalaciones, materiales, procesos, almacenamiento, transporte, entre otros)

Plan Food Defense

Objetivos Principales

- ✓ Prevención de ataques intencionados y/o mitigar sus efectos
- ✓ Capacidad de Respuesta; rápida y eficaz
- ✓ Rápida recuperación de la confianza del consumidor

Estructura del Plan Food Defense

Definiciones:

1. **Compromiso de la dirección**
   - *Incorporación a la política de calidad*
   - *Establecimiento de objetivos*
   - *etc…*

2. **Funciones y Responsabilidades claras**
   - *Equipo de Food Defense*
   - *Multidisciplinario*

3. **Concientizar al personal**
   - FIRST

Estructura del Plan Food Defense

Concientizar al personal

Estructura del Plan Food Defense

4. Análisis de peligros y evaluación de riesgos asociados a los productos

Determinar las características que puedan hacer al producto más susceptible al ataque intencional (vulnerable) y que puedan aumentar el impacto sobre la salud pública.

Ejemplos:

Tamaño del lote: Distribución entre la población.

Uniformidad del producto: Características organolépticas

Vida útil: Consumo en el día o en años

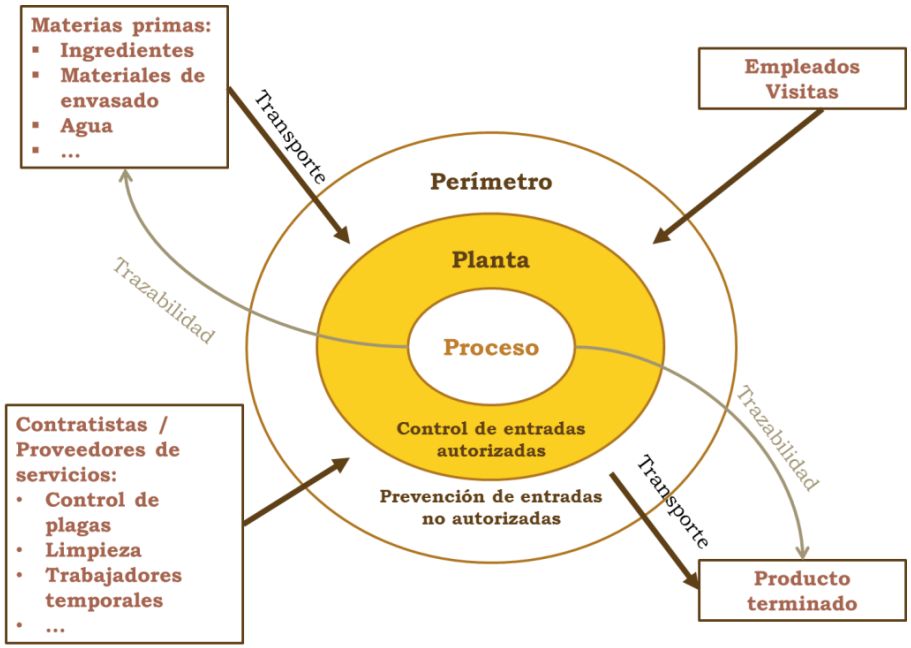
Accesibilidad: Envasado?, hermético?

Estructura del Plan Food Defense

5. Análisis de peligros y evaluación de riesgos asociados a las instalaciones y entorno:

Entorno: plano geográfico, instalaciones adyacentes, índices de criminalidad de la zona, etc.

Edificación y diseño de la planta: Accesibilidad a las instalaciones



Estrategias de Mitigación Generales

*Instalaciones cerradas: menos vulnerables
*Políticas de contratación: alta rotación, más vulnerable.

Estructura del Plan Food Defense

6. **Identificación de <u>vulnerabilidades</u> y determinación de <u>medidas de control</u>**

Existen distintas metodologías: Plan Builder

CARVER+Shock

Estrategias de mitigación focalizadas

Las veremos más adelante…

Plan Food Defense

For Internal Use Only

FOOD DEFENSE PLAN

Spicy Sauce Company

123 Fake Street

Anytown, ST , 43210 USA

Phone: 888-555-8989 Fax: 888-555-8990

Facility Identification #s: FDA Registration #: 12345-98765, State Registration #: 33321-d-476

Facility Descr: Single Building production facility. Approximately 50,000 square feet of prodution floor. Multiple production areas with 3 main ingredient storate areas. 1 main finished product storage areas. Primary access through security gate from main road.

Employee Type Descr: 136 full time employees as of March 1, 2013. Average employee term of service is 4.5 years. Seasonal/Temp workers are not used. Contract workers are only used for pest management, equipment maintenance and support.

Product & Processes: 3 main sauce products. Vegitarian maranara sauce accounts for 75% of total output. Garlic cream sauce accounts for 20% of total output. 4 Cheese alfredo sauce accounts for 5% of total output. Products are distributed in 12 oz. glass jars in cases of 24 jars.

FOOD DEFENSE TEAM

Name	Title	Phone	Primary Contact
Roy G. Biv	President/CEO	888-555-8989 ext. 20	
Allison Starling	Director of Operations	888-555-8989 ext. 25	
Jerry Carson	Quality Manger and Food Safety Officer	888-555-8989 ext. 29	Yes
Anthony Triollo	Facility General Manager	888-555-8989 ext. 52	

BROAD MITIGATION STRATEGIES

Section	Measure	Response	Plan Content	Comments	Action Steps
Outside Security					
1. Property Perimeter	1a. Is the property perimeter secured to prevent entry by unauthorized persons (e.g., by security guards, fence, wall, or other physical barriers)?	Currently Doing	A 6 foot fence secures the property perimeter against unauthorized entry. "No trespassing" signs are posted.		
	1b. Is there adequate lighting around the property perimeter?	Gap	Exterior lights are installed only at perimeter entrance gates.		Yes
2. Building Perimeter	2a. Is there adequate lighting outside each building and in between buildings?	Currently Doing	Exterior lights are installed outside and covers all facility doors and parking areas.		
	2b. Are primary entrances to the buildings and operating areas monitored and secured?	Currently Doing	All primary entrances to the buildings and operating areas are secured. All doors have properly functioning locks or alarms that are checked on a regular basis.		
	2c. Are emergency exit doors self-locking from the outside, with alarms that activate when the doors are opened?	Currently Doing	Emergency exits are installed with self-locking doors and alarms that will sound when emergency exit doors are opened.		
	2d. Are operational entrances, such as the loading dock doors, secured when not in use?	Currently Doing	The loading dock is regularly monitored and doors are secured when not in use.		

Ley de Modernización de la inocuidad de los Alimentos FSMA

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F S M A

Food , Drug and Cosmetic Act (FD&C Act)

CFR Código Federal de Regulaciones Titulo 21 Alimentos, Drogas y Cosméticos

F S M A

TITLE I--IMPROVING CAPACITY TO PREVENT FOOD SAFETY PROBLEMS

Sec. 101. Inspections of records.
Sec. 102. Registration of food facilities.
Sec. 103. Hazard analysis and risk-based preventive controls.
Sec. 104. Performance standards.
Sec. 105. Standards for produce safety.
Sec. 106. Protection against intentional adulteration.
Sec. 107. Authority to collect fees.
Sec. 108. National agriculture and food defense strategy.
Sec. 109. Food and Agriculture Coordinating Councils.
Sec. 110. Building domestic capacity.
Sec. 111. Sanitary transportation of food.
Sec. 112. Food allergy and anaphylaxis management.
Sec. 113. New dietary ingredients.
Sec. 114. Requirement for guidance relating to post harvest processing of raw oysters.
Sec. 115. Port shopping.
Sec. 116. Alcohol-related facilities.

TITLE II--IMPROVING CAPACITY TO DETECT AND RESPOND TO FOOD SAFETY PROBLEMS

Sec. 201. Targeting of inspection resources for domestic facilities, foreign facilities, and ports of entry; annual report.
Sec. 202. Laboratory accreditation for analyses of foods.
Sec. 203. Integrated consortium of laboratory networks.
Sec. 204. Enhancing tracking and tracing of food and recordkeeping.
Sec. 205. Surveillance.
Sec. 206. Mandatory recall authority.
Sec. 207. Administrative detention of food.
Sec. 208. Decontamination and disposal standards and plans.
Sec. 209. Improving the training of State, local, territorial, and tribal food safety officials.
Sec. 210. Enhancing food safety.
Sec. 211. Improving the reportable food registry.

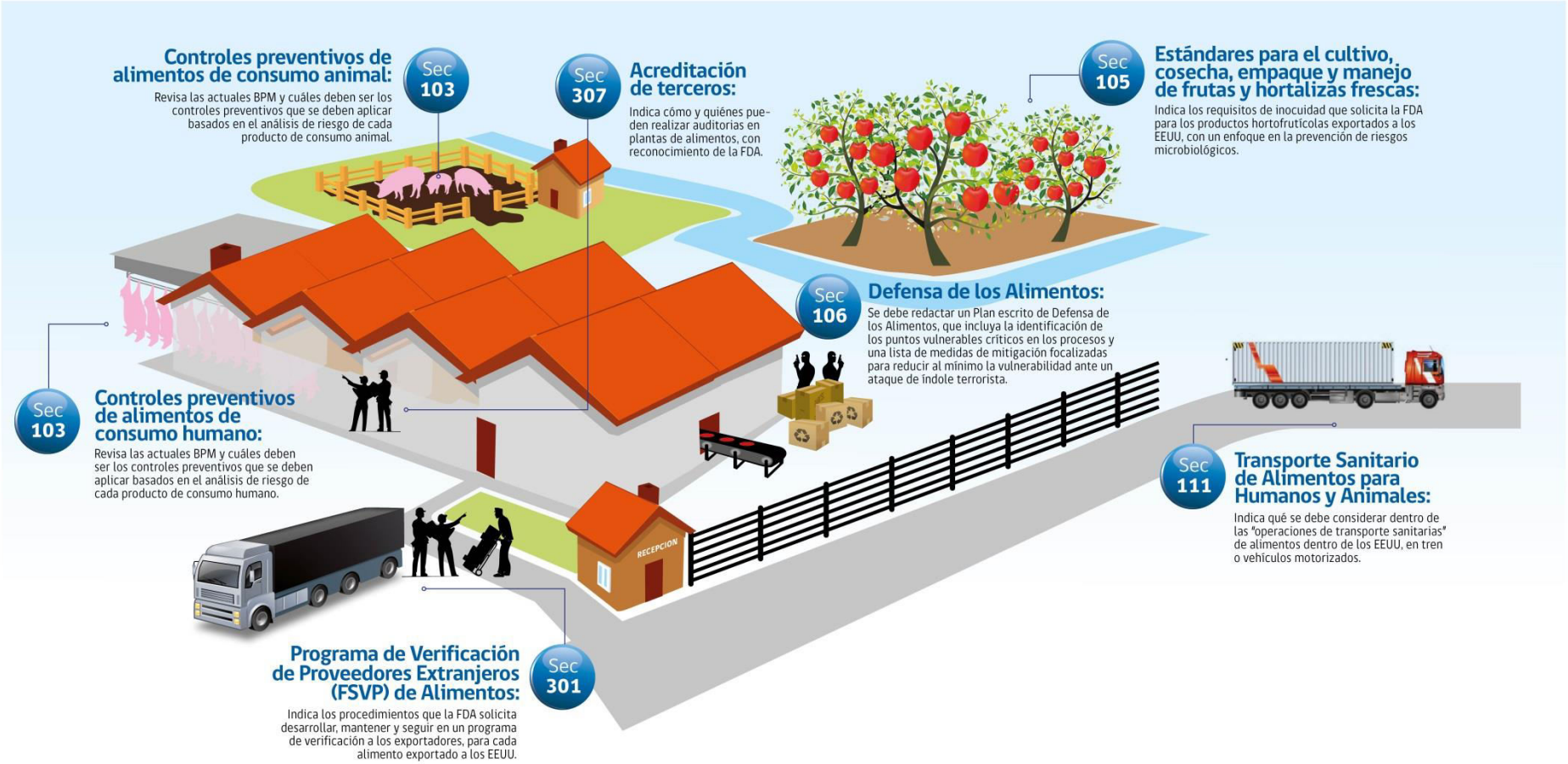
TITLE III--IMPROVING THE SAFETY OF IMPORTED FOOD

Sec. 301. Foreign supplier verification program.
Sec. 302. Voluntary qualified importer program.
Sec. 303. Authority to require import certifications for food.
Sec. 304. Prior notice of imported food shipments.
Sec. 305. Building capacity of foreign governments with respect to food safety.
Sec. 306. Inspection of foreign food facilities.
Sec. 307. Accreditation of third-party auditors.
Sec. 308. Foreign offices of the Food and Drug Administration.
Sec. 309. Smuggled food.

TITLE IV--MISCELLANEOUS PROVISIONS

Sec. 401. Funding for food safety.
Sec. 402. Employee protections.
Sec. 403. Jurisdiction; authorities.
Sec. 404. Compliance with international agreements.
Sec. 405. Determination of budgetary effects.

FSMA | LEY DE MODERNIZACIÓN DE LA INOCUIDAD DE LOS ALIMENTOS



“Food Safety Modernization Act” (FSMA)

ALCANCE

- ✓ La norma completa aplica para todos los establecimientos que produzcan alimentos para **consumo humano** y que deban estar registradas en la FDA.

Sin embargo, existen exenciones totales y parciales según el enfoque de cada norma.

Sec.106 FSMA: "Estrategias de Mitigación Focalizadas para la protección de los alimentos ante adulteración intencional" – FOOD DEFENSE

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Alcance de la norma propuesta

Actos de empleados descontentos, consumidores o competidores con la intención de **perjudicar la imagen de una empresa**.

No está contemplado en la norma

Adulteración con motivación económica (EMA), con la intención de **obtener beneficios económicos**.

No está contemplado en la norma

Actos cometidos con la intención de **causar daño extendido a la salud pública**, incluidos los actos terroristas.

Si aplica y es el principal enfoque de la norma.

Exenciones a la norma propuesta

- ✓ Actividades propias de la norma Sec. 105: "**Estándares para cultivo, cosecha, empaque y manejo de Frutas y Verduras para consumo humano**".
- ✓ Transporte de alimentos.
- ✓ Almacenamiento de alimentos.
- ✓ Actividades de empaque y etiquetado donde el contenedor que contacta el alimento no es intervenido.
- ✓ Elaboración, procesamiento, empaque y almacenamiento de piensos.

Exenciones a la norma propuesta

- ✓ Todas las plantas que cumplan con el requisito de: **“Instalación limitada”**

Por ejemplo: “Negocio muy pequeño”

⇩

Ventas anuales por menos de USD $10.000.000

Aspectos más relevantes de la norma propuesta

Para cumplir con la norma se deben considerar los siguientes temas:

1. Plan de Food Defense
2. Identificación de los “procesos accionables”
3. Implementación de las estrategias de mitigación focalizadas
4. Monitoreo
5. Acciones correctivas
6. Verificación
7. Entrenamiento del personal

De las medidas implementadas en 3)

Aspectos más relevantes de la norma propuesta

1. **Plan de Food Defense**
2. Identificación de los “procesos accionables”
3. Implementación de las estrategias de mitigación focalizadas
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7. Entrenamiento del personal

1. Plan de Food Defense

El dueño u operador de la planta deben tener un **Plan de Food Defense escrito.**

Los contenidos de este plan son:

1. Identificación de los procesos accionables.
2. Estrategias de mitigación focalizadas.
3. Procedimientos de monitoreo.
4. Procedimientos de verificación.
5. Procedimientos de acciones correctivas.

1. Plan de Food Defense

A pesar de que éstos son los elementos mínimos, el FDA recomienda también incluir información adicional como,

1. Diagramas de flujo de los procesos.
2. Evaluación de estrategias generales de mitigación
3. Contactos de emergencia.
4. Planes de manejo de crisis.
5. Etc…

1. Plan de Food Defense

- ✓ El FDA ha diseñado el “Food Defense Plan Builder”, el cual es un software gratis y no vinculante.

Food Defense Plan Builder

The Food Defense Plan Builder is a user-friendly software program designed to assist owners and operators of food facilities with developing personalized food defense plans for their facilities. This user-friendly tool harnesses existing FDA tools, guidance, and resources for food defense into one single application.

The Food Defense Plan Builder guides the user through the following sections:

- Company Information
- Broad Mitigation Strategies
- Vulnerability Assessment
- Focused Mitigation Strategies
- Emergency Contacts
- Action Plan
- Supporting Documents

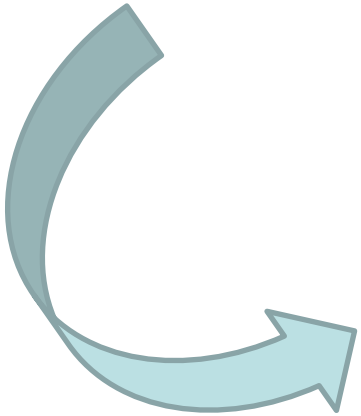
DOWNLOAD the Food Defense Plan Builder (view system requirements)

Aspectos más relevantes de la norma propuesta

1. Plan de Food Defense
2. **Identificación de los “procesos accionables”**
3. Implementación de las estrategias de mitigación focalizadas
4. Monitoreo
5. Acciones correctivas
6. Verificacion
7. Entrenamiento del personal

Qué son los “procesos accionables” (PA)?

“Procesos en los que la aplicación de medidas es fundamental para prevenir vulnerabilidades o reducirlas a niveles aceptables”.



Análogo a los Puntos Críticos de Control en HACCP

2. Identificación de los PA

Se puede realizar mediante 2 procedimientos

Identificación de los PA usando la clasificación de **“actividades clave”** propuesta por la FDA.

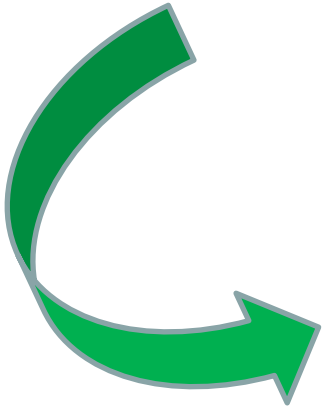
- ✓ Recepción y carga de líquidos a granel
- ✓ Almacenamiento y manejo de líquidos
- ✓ Manejo de ingredientes secundarios
- ✓ Mezcla y actividades similares

Identificación de los PA mediante una **“Evaluación de vulnerabilidad”**.

Usando el método **“Carver+shock”** (http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm094560.htm)

2. Identificación de los PA

Identificación de los PA usando la clasificación de **“actividades clave”** propuesta por la FDA.



Si la planta tiene algún proceso que clasifique como actividad clave, se debe realizar una identificación de esta actividad como un PA.

Esto se debe realizar para cada tipo de alimento elaborado, procesado, empacado o almacenado en la planta.

2. Identificación de los PA

Identificación de los PA mediante una **“Evaluación de vulnerabilidad”**.

CARVER+SHOCK

Criticality: What impact would an attack have on public health and the economy?
Accessibility: How easily can a terrorist access a target?
Recuperability: How well could a system recover from an attack?
Vulnerability: How easily could an attack be accomplished?
Effect: What would be the direct loss from an attack, as measured by loss in production?
Recognizability: How easily could a terrorist identify a target?

Aspectos más relevantes de la norma propuesta

1. Plan de Food Defense
2. Identificación de los “procesos accionables”
3. **Implementación de las estrategias de mitigación focalizadas**
4. Monitoreo
5. Acciones correctivas
6. Verificación
7. Entrenamiento del personal

3. Implementación de las estrategias de mitigación focalizadas (EMF)

- ✓ Una vez identificados los PA, se proponen estrategias para reducir la vulnerabilidad del proceso.

- ✓ El FDA otorga flexibilidad absoluta en la determinación de sus EMF, considerando la diversa naturaleza de los procesos y la "experiencia"de la industria.

3. Implementación de las estrategias de mitigación focalizadas (EMF)

Por ejemplo:

- Una industria de lácteos desea implementar un Plan de Food Defense.
- Ha decidido identificar sus PA a través de las actividades clave del FDA.

Los tanques clasifican como actividad clave: “Mezcla y actividades similares”

Por lo que debe proponer EMF para reducir las vulnerabilidades al mínimo

Aspectos más relevantes de la norma propuesta

1. Plan de Food Defense
2. Identificación de los “procesos accionables”
3. Implementación de las estrategias de mitigación focalizadas
4. **Monitoreo**
5. **Acciones correctivas**
6. **Verificación**
7. Entrenamiento del personal

De las medidas implementadas en 3)

Aspectos más relevantes de la norma propuesta

4. **Monitoreo**
5. **Acciones correctivas**
6. **Verificación**

En general no hay requisitos particulares. Se considera que utilizando los criterios de HACCP, se cumple los requisitos para este capítulo.

Aspectos más relevantes de la norma propuesta

1. Plan de Food Defense
2. Identificación de los “procesos accionables”
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4. Monitoreo
5. Acciones correctivas
6. Verificación
7. **Entrenamiento del personal**

7. Entrenamiento del personal

- ✓ Todo el personal asignado a un PA debe recibir entrenamiento en Food Defense.

- ✓ Los **contenidos mínimos** para el entrenamiento son cubiertos por el "**Food Defense Awareness for the Front-line Employee**" que toma aproximadamente 20 minutos.

- ✓ Sin embargo, es necesario que el empleado reciba entrenamiento adicional sobre las EMF que están aplicando y que son de su competencia.

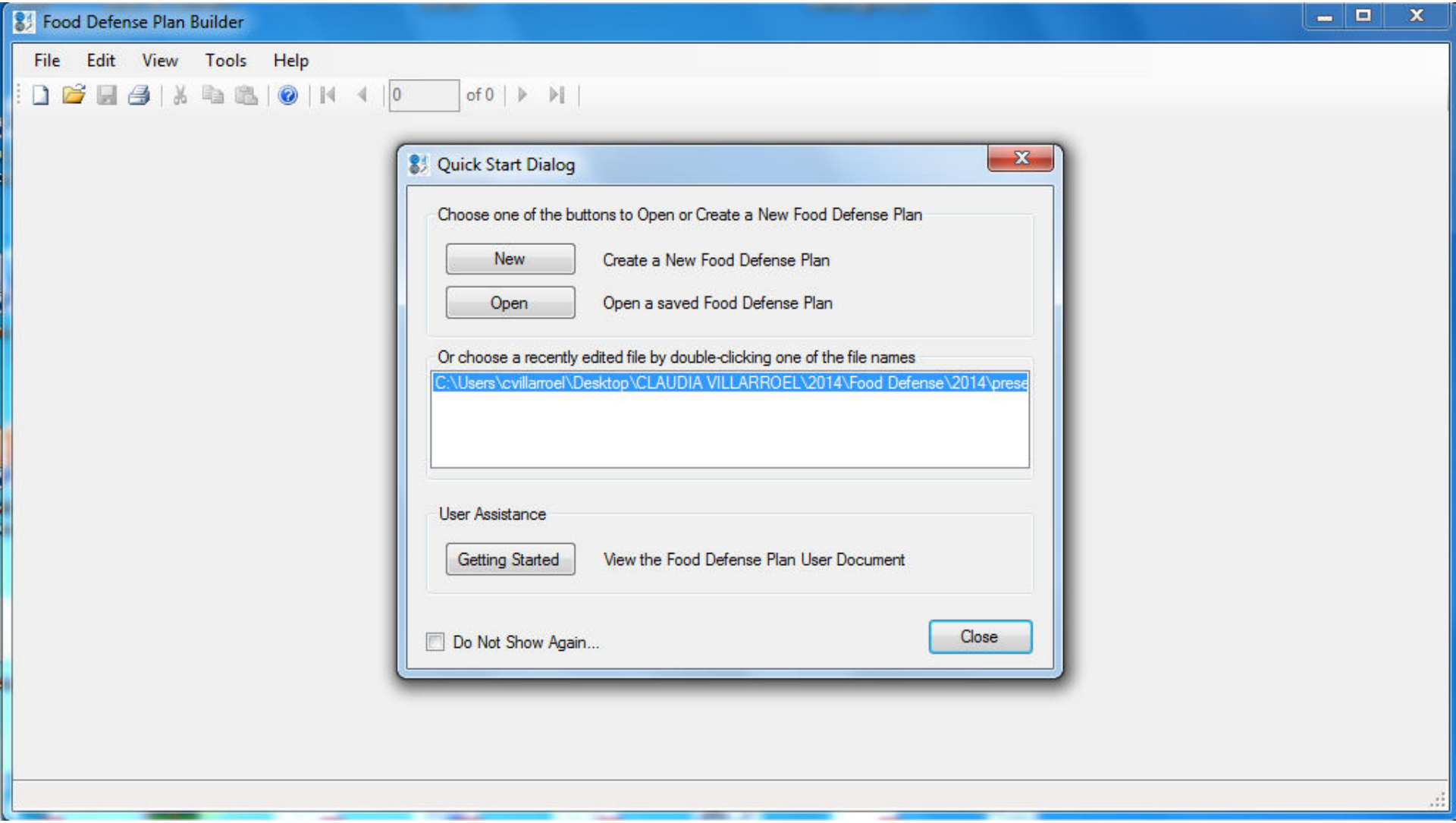
7. Entrenamiento del personal

- ✓ Por último, es necesario mantener un registro de cuando fueron entrenados los empleados y los contenidos tratados en cada capacitación.

- ✓ La FDA ha desarrollado diversas herramientas de entrenamiento gratis disponibles en: ***http://www.fda.gov/Food/FoodDefense/default.htm***

FD Plan Builder

FD Plan Builder



FD Plan Builder

Food Defense Plan Builder - Conserva de frutas*

File Edit View Tools Help

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Company Information | Broad Mitigation Strategies | Vulnerability Assessment | Focused Mitigation Strategies | Emergency Contacts | Action Plan | Food Defense Plan | Supporting Documents

Company Name: Conservas de Frutas

Address:

Country:

City, State:

Postal Code:

Phone Numbers: Phone

Fax

Other

Facility Identifier Numbers:

	Description	Number
▶	FDA Registration #	

Facility Description: General description of the company and the physical attributes of the facility.

Employee Description: Information about the number and types of employees at the facility.

Product Description: A description of the product or product categories, the main processes involved.

Food Defense Team:

	Name	Title	Phone	Primary Contact

Conserva de frutas

FD Plan Builder

Food Defense Plan Builder - Conserva de frutas*

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Company Information | Broad Mitigation Strategies | Vulnerability Assessment | Focused Mitigation Strategies | Emergency Contacts | Action Plan | Food Defense Plan | Supporting Documents

- All
  - Outside Security
    - 1. Property Perimeter
      - 1a. Is the property perimeter se
      - 1b. Is there adequate lighting a
    - 2. Building Perimeter
      - 2a. Is there adequate lighting c
      - 2b. Are primary entrances to th
      - 2c. Are emergency exit doors s
      - 2d. Are operational entrances,
      - 2e. Are all possible access poir
      - 2f. Are products and ingredient
    - 3. Vehicles
      - 3a. Does the property have a c
      - 3b. Are all vehicles entering the
      - 3c. Where practical, is there sc
  - General Inside Security
    - 4. Facility/Plant
      - 4a. Is there adequate lighting tl
      - 4b. Is there an emergency light
      - 4c. Does your facility have mor
      - 4d. Does your facility have est
      - 4e. Does your facility have an
      - 4f. Is access to production, sto
      - 4g. Is there a procedure in plac
      - 4h. Are copies of the facility's s

1. Outside Security: Property Perimeter

1a.	Is the property perimeter secured to prevent entry by unauthorized persons (e.g., by security guards, fence, wall, or other physical barriers)?

☐ Not Applicable ☐ Currently Doing ☐ Gap

Comments: ☑ Include Comments In Plan

Plan Content

Action Steps Needed

Back Next

Section Description:
What food defense measures have you implemented at your facility's property perimeter?

Using multiple layers of security to protect the property perimeter is ideal because it makes the accessibility of the facility and grounds more difficult. The outermost layer is at the perimeter of the facility. Evaluate what food defense measures your facility has for the property perimeter.

Description:
The property perimeter should be secured to reduce the risk of unauthorized entry. Physical barriers, such as a fence or a wall, can be used to restrict access to the facility. Security guard patrols may substitute when a physical barrier is impractical. Guards can also provide a layer of defense in addition to physical barriers.

Sample Plan Content:
A fence secures the property perimeter against unauthorized entry. "No trespassing" signs are posted. The perimeter of the

Conserva de frutas

FD Plan Builder

Food Defense Plan Builder - Conserva de frutas*

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Company Information | Broad Mitigation Strategies | Vulnerability Assessment | Focused Mitigation Strategies | Emergency Contacts | Action Plan | Food Defense Plan | Supporting Documents

Vulnerability Assessment: Process Name: All

	Process Name	#	Process Steps	Accessibility	Vulnerability	Sum	Actionable
Edit	Elaboración de Conservas de Frutas	1	Recepcion materia prima	9-10 Easily Accessible	7-8 Vulnerable	18	☑
Edit	Elaboración de Conservas de Frutas	2	Lavado	7-8 Accessible	7-8 Vulnerable	16	☑
Edit	Elaboración de Conservas de Frutas	3	Inspección	9-10 Easily Accessible	5-6 Somewhat Vulnerable	16	☑
Edit	Elaboración de Conservas de Frutas	4	Cubeteado	9-10 Easily Accessible	7-8 Vulnerable	18	☑
Edit	Elaboración de Conservas de Frutas	5	Pasteurización	3-4 Hardly Accessible	5-6 Somewhat Vulnerable	10	☐
Edit	Elaboración de Conservas de Frutas	6	Congelado	5-6 Partially Accessible	5-6 Somewhat Vulnerable	12	☑
Edit	Elaboración de Conservas de Frutas	7	Detección de metales	9-10 Easily Accessible	5-6 Somewhat Vulnerable	16	☐
Edit	Elaboración de Conservas de Frutas	8	Envasado y Pesaje	9-10 Easily Accessible	7-8 Vulnerable	18	☑
Edit	Elaboración de Conservas de Frutas	9	Empaque	7-8 Accessible	1-2 Not Vulnerable	10	☑
Edit	Elaboración de Conservas de Frutas	10	Despacho	9-10 Easily Accessible	5-6 Somewhat Vulnerable	16	☐

FD Plan Builder

Food Defense Plan Builder - Conserva de frutas*

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Company Information | Broad Mitigation Strategies | Vulnerability Assessment | Focused Mitigation Strategies | Emergency Contacts | Action Plan | Food Defense Plan | Supporting Documents

Process Name	#	Process Steps	Sum	Mitigation Strategies	
Elaboración ...	1	Recepcion materia prima	18	Fence off appropriate area around the wellhead/spring to minimize possible intentional surface contamination (minimum area 50 ft. radius) For all potable water systems, restrict access to pumping, storage, piping and treatment systems (to include filtering) as well as air sources for pressurization Design or modify water system to minimize obscure access points (e.g., unused valves, tees, and nipples) Establish a chemical and biological baseline water profile	Search
Elaboración ...	2	Lavado	16		Search
Elaboración ...	3	Inspección	16		Search
Elaboración ...	4	Cubeteado	18		Search
Elaboración ...	6	Congelado	12		Search
Elaboración ...	8	Envasado y Pesaje	18		Search
Elaboración ...	9	Empaque	10		Search

Conserva de frutas

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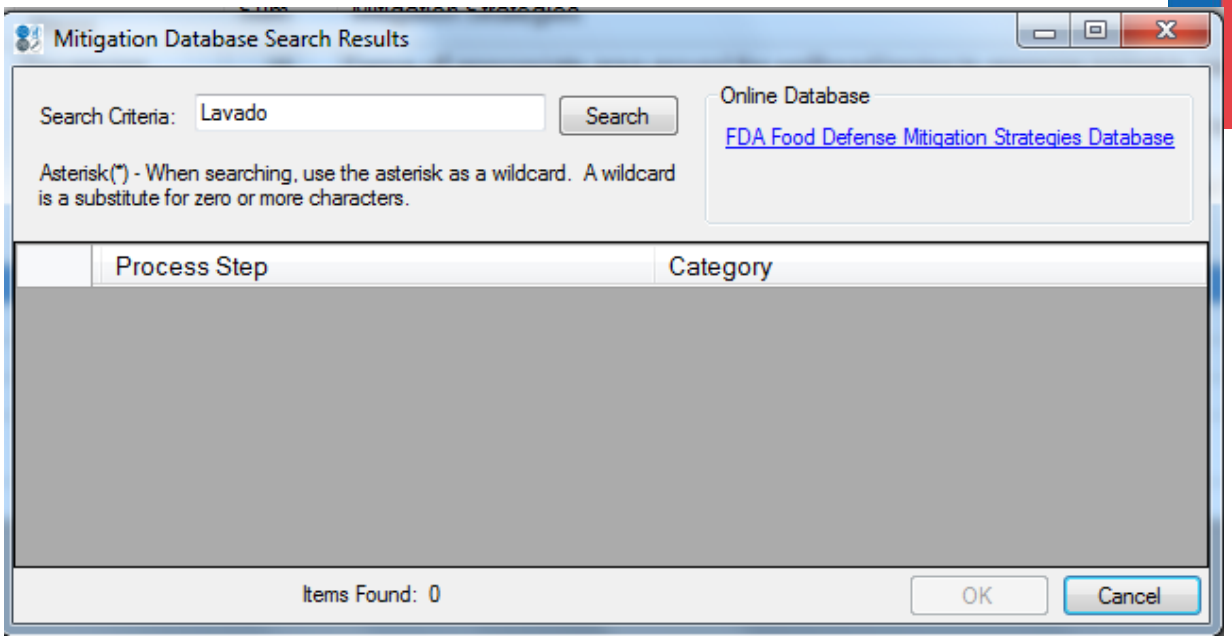

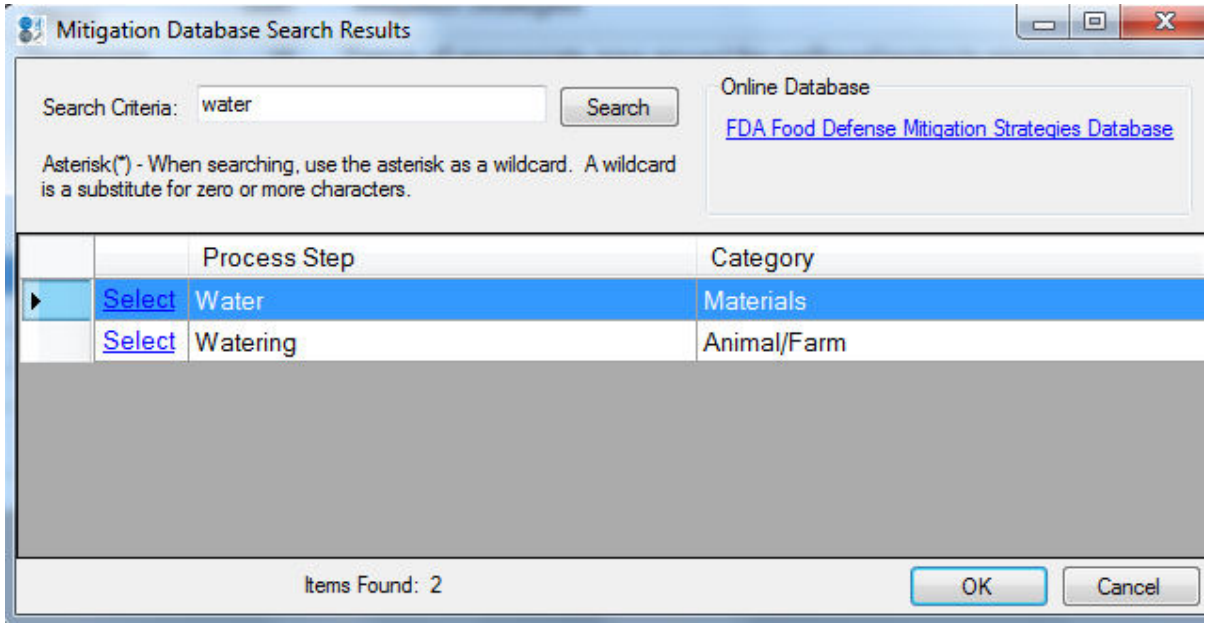

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Mitigation Search Results

Process Step: Water Category: Engineering and Security Applications

Objective: Reduce opportunities for intentional contamination of product using water as an ingredient.

	Strategy
☐	Secure all water treatment supplies (filters, minerals, chemicals)
☐	Restrict maintenance and water treatment system access to authorized employees.
☐	Secure all water system cleaning supplies
☐	For non-public potable water sources, restrict access to wellhead, spring, cistern, as well as pumping, filtering, storage and piping systems
☐	Fence off appropriate area around the wellhead/spring to minimize possible intentional surface contamination (minimum area 50 ft. radius)
☐	Protect pumping system controls with swipe cards, cipher pads or biometric controls
☐	For all potable water systems, restrict access to pumping, storage, piping and treatment systems (to include filtering) as well as air sources for pressurization
☐	Ensure that any water system modifications maintain backflow protection
☐	Design or modify water system to minimize obscure access points (e.g., unused valves, tees, and nipples)
☐	Protect treatment system controls with swipe cards, cipher pads, or biometric devices
☐	Secure all plans/drawings/schematics of the water system
☐	Establish a chemical and biological baseline water profile
☐	Whether sourced publicly or privately, frequently test and record water attributes to ensure adherence to safety standards and compare regularly with baseline profile
☐	Limit access to system and controls and supplies to authorized employees
☐	Ensure that contractors for water system cleaning and maintenance have a security plan in place
☐	Develop a protocol to deal with "suspect" water

OK Cancel

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Process Name	#	Process Steps	Sum	Mitigation Strategies	
Elaboración ...	1	Recepcion materia prima	18	Fence off appropriate area around the wellhead/spring to minimize possible intentional surface contamination (minimum area 50 ft. radius) For all potable water systems, restrict access to pumping, storage, piping and treatment systems (to include filtering) as well as air sources for pressurization Design or modify water system to minimize obscure access points (e.g., unused valves, tees, and nipples) Establish a chemical and biological baseline water profile	Search
Elaboración ...	2	Lavado	16	Secure all water treatment supplies (filters, minerals, chemicals) Protect pumping system controls with swipe cards, cipher pads or biometric controls For all potable water systems, restrict access to pumping, storage, piping and treatment systems (to include filtering) as well as air sources for pressurization Ensure that any water system modifications maintain backflow protection	Search
Elaboración ...	3	Inspección	16		Search
Elaboración ...	4	Cubeteado	18		Search
Elaboración ...	6	Congelado	12		Search
Elaboración ...	8	Envasado y Pesaje	18		Search
Elaboración ...	9	Empaque	10		Search

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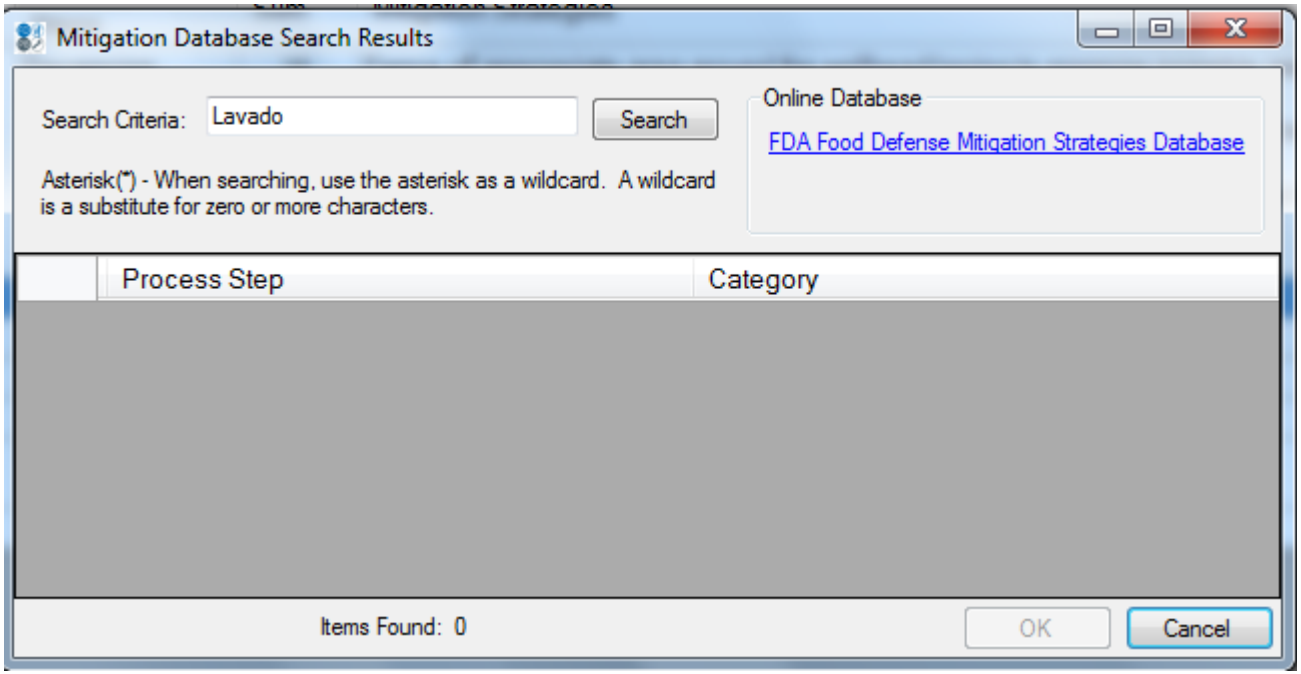

Base de datos de estrategias de mitigación FD

http://www.accessdata.fda.gov/scripts/fooddefensemitigationstrategies/index.cfm

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This guidance represents the Food and Drug Administration's (FDA's) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach, contact the FDA staff responsible for implementing this guidance. If you cannot identify the appropriate FDA staff, call the appropriate telephone number listed on the title page of this guidance.

HOW TO USE THIS TOOL

Welcome to the Food Defense Mitigation Strategies Database. This database is one of several tools developed by the FDA for the food industry to help protect our nation's food supply from intentional acts of contamination or tampering. Specifically, this resource is designed for companies that produce, process, store, package, distribute, or transport food or food ingredients. It provides a range of preventive measures that companies may choose to better protect their facility, personnel, and operations. These safety measures are specific to individual categories that impact every step of the food production and distribution process.

Not all measures are applicable or practical for all sizes and types of food production. It is the responsibility of the owner/operator/supervisor to choose those measures that may be helpful and appropriate for their facility.

Data can be accessed using two different methods.

1. LOOKUP TOOL: Data can be searched by a specific item, or *node*, commonly used within commercial food production and distribution. First, select a food industry category from the provided list. Once the category is selected, a list of nodes will be provided to choose from. Once the node is chosen, select "GO" to view its safety objective(s) and steps that can be taken to ensure safety.
2. SEARCH ENGINE TOOL: Data can be searched by a specific term or keyword. Similar to any search engine on the Web, type in the desired item to be found and select GO; a list of applicable items will be returned.

LOOKUP TOOL

To begin, select a category and node from the drop down menus shown below, then click on the "Go" button. Alternatively, you may search for keywords using the search engine provided. (See Below)

Category:

- SELECT A CATEGORY -

Node:

- SELECT A NODE -

GO

SEARCH ENGINE TOOL

You can access a specific Node Security Data Sheet by entering a keyword (i.e. mixing tank) into the text box. Then, select the "GO" button. The application will provide you with results that best match your keyword.

Enter Search Term:

GO

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Emergency Phone List:

Resource	Phone
Local Emergency	9-1-1
Local Police Department	
Local Fire Department	
Local FBI	
Local Public Health Department	
Poison Control	
County Law Enforcement Agency	
State Law Enforcement Agency	
State Department of Health	
FBI Headquarters 24 Hour Hotline	(202) 324-3000
FDA Non-Emergency Phone #	Use this link http://www.fda.gov/Safety/ReportaProblem/Co

Supplier Contacts:

Company Name	Phone Number(s)	Contact Person(s)

Customer Contacts:

Company Name	Phone Number(s)	Contact Person(s)

Contractor Contacts:

Company Name	Phone Number(s)	Contact Person(s)

Company Emergency Contacts:

Name	Title	Phone

Other Contacts:

Company Name	Phone Number(s)	Contact Person(s)

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Measure # or Process Step	Action Steps	Status	Responsibility	Priority	Target Cmplt Date
1a. Is the property perimeter secured to prevent entry by unauthorized persons (e.g., by security guards, fence, wall, or other physical barriers)?		New	N. N	High	05-09-2014
1b. Is there adequate lighting around the property perimeter?		New			05-09-2014
Elaboración de Conservas de Frutas - 1. Recepcion materia prima	Fence off appropriate area around the wellhead/spring to minimize possible intentional surface contamination (minimum area 50 ft. radius) For all potable water systems, restrict access to pumping, storage, piping and treatment systems (to include filtering) as well as air sources for pressurization Design or modify water system to minimize obscure access points (e.g., unused valves, tees, and nipples) Establish a chemical and biological baseline water profile	New			05-09-2014
Elaboración de Conservas de Frutas - 2. Lavado	Secure all water treatment supplies (filters, minerals, chemicals) Protect pumping system controls with swipe cards, cipher pads or biometric controls For all potable water systems, restrict access to pumping, storage, piping and treatment systems (to include filtering) as well as air sources for pressurization Ensure that any water system modifications maintain backflow protection	New			05-09-2014
Elaboración de Conservas de Frutas - 3. Inspección		New			05-09-2014
Elaboración de Conservas de Frutas - 4. Cubeteado		New			05-09-2014
Elaboración de Conservas de Frutas - 6. Congelado		New			05-09-2014
Elaboración de Conservas de Frutas - 8. Envasado y Pesaje		New			05-09-2014
Elaboración de Conservas de Frutas - 9. Empaque		New			05-09-2014

Details

Status: New Responsibility: N. N Priority: High

Planned Start Date: 05-09-2014 Actual Start Date: 05-09-2014 Target Completion Date: 05-09-2014 Actual Completion Date: 05-09-2014

Action Steps

Comments

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For Internal Use Only

FOOD DEFENSE PLAN

Conservas de Frutas

Facility Identification #s:

Facility Descr:

Employee Type Descr:

Product & Processes:

FOOD DEFENSE TEAM

Name	Title	Phone	Primary Contact

BROAD MITIGATION STRATEGIES

Section	Measure	Response	Plan Content	Comments	Action Steps
Outside Security					
1. Property Perimeter	1a. Is the property perimeter secured to prevent entry by unauthorized persons (e.g., by security guards, fence, wall, or other physical barriers)?	Gap			Yes
	1b. Is there adequate lighting around the property perimeter?	Gap			Yes
2. Building Perimeter	2a. Is there adequate lighting outside each building and in between buildings?				
	2b. Are primary entrances to the buildings and operating areas monitored and secured?				
	2c. Are emergency exit doors self-locking from the outside, with alarms that activate when the doors are opened?				
	2d. Are operational entrances, such as the loading dock doors, secured when not in use?				
	2e. Are all possible access points				

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Supporting Documents

	File	Description

Conserva de frutas

GRACIAS POR SU ATENCIÓN…

claudia.villarroel@achipia.gob.cl

ACHIPIA
Ministerio de Agricultura

Gobierno de Chile