

## Security & Food Defense

### Choose a pragmatic way

Our regular readers may be reassured, Food Defense has not become our team's only passion. If we come back to it in this edition after two ExarisInfo on this issue ([n° 36](#) in Aug. 2009 & [n°50](#) in Sept. 2011) that is not really our choice: actuality forced it. **Even though true threat does not seem to increase** (considering the few known cases where food was for sure contaminated by criminals), IFS certified companies shall however bring satisfying answers to chapter 6 requirements in version 6 of the standard: Food defense appropriate control measures are required, based on a "hazards analysis and risks evaluation".

But the 8 requirements of the IFS Standard (among which only 6 are applicable to all companies) do not really help to **build a structured, pragmatic and adapted answer** to an issue that overpasses food contamination's only scope. It is up to each company to build and implement its "VACCP", "TACCP" or even a CARVER evaluation following the American FDIS model (*we kindly invite you to read again ExarisInfo [n°36](#) & [50](#) that deal in detail with these sources and recommendations*). However, after research, analysis & tests in the field, none of these approaches seemed really conclusive to us from an operational point of view: VACCP/TACCP are more "ideas" than true structured methods and CARVER in its original frame appears very heavy to implement, for a result that we believe possible to reach otherwise and more easily.

These statements inspired us and led us to elaborate another way: **operative** as it adapts the response level to effective threat, **pragmatic** as it refers to legitimate recommendations, and of course **conform** to "Food Safety" standards.

We named it **PFDC**: internal Program for Food Defense ([see on line presentation](#)).

### 1. Build an internal Food Defense Plan: adopt an operational method

Let us remind that numerous texts are published on this issue by legitimate authors like: American inspection department of agriculture [CARVER method], UK Centre for protection of national infrastructure [PAS96: *Defending Food and Drink*] or French General secretary for national defense [*Guide (interministériel) des recommandations pour la protection de la chaîne alimentaire contre les risques d'actions malveillantes, criminelles ou terroristes*].

When we wrote preceding Exarisinfo on Food Defense we were still analyzing these texts, looking for the one that would propose the most directly operative method. It revealed to be more complicated than that as none of these available sources brings a fully satisfying answer to users' needs that is conducting a risks assessment and implementing adapted control measures [*in food processing/supplying business*]. However all these sources converge as follows: they are written and exposed as recommendations, leaving each company free to elaborate a documented and argued answer, consistent with its operating context and potential related requirements (American regulation, certification...).

Then we took advantage of these three reference sources to propose a method that is directly applicable by Food businesses. This method applies in **10 steps** (see fig. 1 in following page) whose three pillars are based on reference texts:

- **Evaluate the threat**, partially inspired from UK PAS96, relatively pragmatic on this issue
- **Identify sensitive areas**, inspired from CARVER principles made applicable at food production plant level
- And finally **assess preventative or control measures** to elaborate an **action plan** towards solutions that are adapted to applicable vigilance level. For this step we had to choose a recommendations standard among identified sources, in order to guarantee our approach's legitimacy and perennity: we opted for the French inter-ministry Guideline that wrote its recommendations in a pragmatic and structured way and which content is in line with American and British texts.

The method is based on "**ready-to-use**" tool developed with Excel®, that allows to elaborate a full internal Food Defense Plan (PFDC) at **plant level**. Far from pretending it constitutes the "only right answer" to the matter it however seems that this approach progressively reaches its **pragmatism and efficiency** target with more than **150 companies using** it and a positive feedback from certification auditors.

#### Exaris & you

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## 2. Short term perspectives: the method confronted to practice

Having a method is one thing, putting it to practice is another one. Once relief related to having a technical solution to a certification issue has passed the next question is how can we optimize its practice in response to company real needs. Next steps will be focused on capitalizing experience feedbacks in order to:

- Enforce methodological control
- Harmonize risk assessment
- Facilitate relevant control measures sharing
- Optimize answers to auditors expectations...

That is today's challenge for our team. PFD license owners will soon be granted with **dedicated information** aiming at increasing their performances in terms of Food Defense. At first these actions will allow to sustainably answer certification requirements but also and above all get prepared to enlarge Food Defense's scope to Security as a whole.

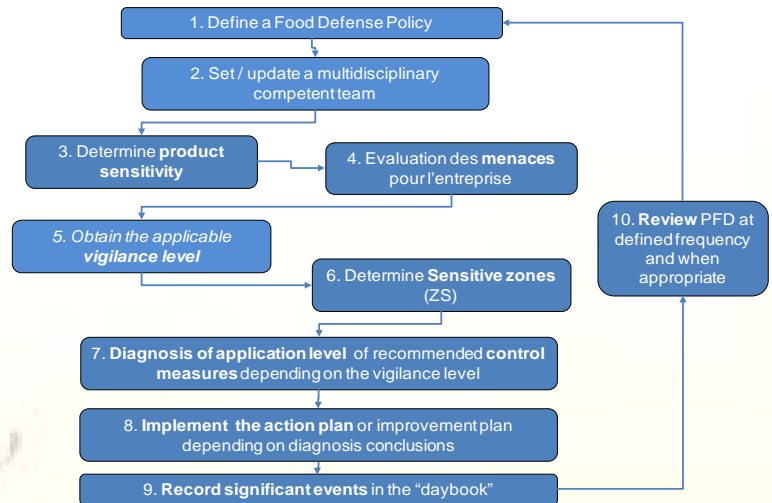


Fig. 1 – Build and implement a PFD© in 10 steps

## 3. Mid-term perspectives: Security in the broad sense

As we already underlined in ExarisInfo n°50 Food Defense is only a component of Security as it only covers criminal acts that will have a potential impact on the food chain and its end consumers. It is quite easy to figure out that if one wants to damage a company's activity there are more direct ways than attacking its products.

Let's consider this true story that happened in April 2012: a food processing company based along a national road was targeted by a series of five explosions, probably criminal. Despite the destruction of the dryer the activity could however go on. The objective was obviously to disrupt or even stop the company's activity and provoke a direct financial prejudice.

This kind of act does not necessarily induces sanitary consequences on the food chain itself, however other immediate **civil security consequences** can arise from this act (fire, direct physical injuries, environmental pollution...). And it is quite predictable that this kind of act constitutes a more real threat for some companies than a threat on the food chain through the means of its products.

If it is quite obvious that control measures that will have been implemented in the context of the Food Defense Plan will also have **benefic impacts on security in the broad sense**, will they be sufficient? If today version 1 of Exaris PFD tool brings an answer to the requirements of GFSI recognized standards (among which IFSv6), it seems a priority to start preparing a version 2 that will fully integrate a global Security approach. The idea would be to propose a tool that could also be valorized with insurance companies; the overall target is to extend to a **global response** the efforts that companies are today doing for certification purposes.

### Conclusion

Although its users and auditors seem to progressively acknowledge the PFD a true legitimacy, it is of course not the unique answer to a wide issue that Food businesses did not wait for IFS v6 to look into.

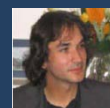
Regardless of the approach that is eventually chosen the main thing is to opt for pragmatism, that is **the right adequacy between investment and assessed threat**. The issue for us in the coming months is to enlarge this pragmatic approach to other threat-consequence couples, for our clients' utmost benefit.

Meanwhile do not hesitate to [come a discover PFD!](#)

**Contact us for mutual improvement!**

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