PFD©v3.1 – Expanding your Food Defense Plan to broad Security

The PFD©v3.0 will be 2 years old next July: this is an opportunity to briefly review the contributions of this version and to present its successor, the **PFD©v3.1**.

1. PFD©v3.0 : feedback

As a reminder (see FAQ No. 5), the changes made by v3.0 were mainly focused on the implementation of **focused mitigation measures** in sensitive areas, which themselves contain sensitive equipment (see definition below). The aim was to comply with the requirements of the US **FSMA** (Food Safety Modernization Act).

The added value brought by these developments was widely underlined by the 360 people trained to PFD©v3.0 (with 180 licenses issued to industrial sites).

The feedback we would like to share with you concerns two points that seem important to us: the methods for securing areas on one hand, the equipment on the other hand.

As a reminder, we define a "**Food Sensitive Area**" as containing at least **one sensitive equipment or activity**, i.e:

- either unprotected products are easily accessible (open process, tipping stations, products handling...),
- or equipment allows indirect product contamination (via utilities...),
- or equipment allows to modify production parameters with a potential impact on food safety (server, supervision...).

Example 1 :

Let's consider the storage of food products in tanks located outside the building. Tanks are considered as "sensitive equipment" as hatches allow access to unprotected product; it is therefore necessary to control them in terms of accessibility and detection. Two complementary strategies are then possible: either secure the area in which the tanks are located, then the tanks themselves if necessary, or secure only the tanks if it is not possible to secure the area. In practice:

- The tanks themselves may not have any access control devices (e.g. a ladder with secured access) but are usually fitted with locking systems (padlocks, etc.) to secure the opening of hatches;
- The areas around the tanks may have no particular mitigation measures, may be equipped with surveillance cameras (detection) or the tanks may be in a fenced area with controlled access...

Here is the illustration of these different scenarios in the PFD©v3.0 :

Focused mitigation / Daybook **Identification of areas according to the plant layout map**	Insert several areas / Insert an area / Insert sensitive equip./activity / Delete rows **Sensitive equipment/activities in the area**		**Area's mitigation(1)**		**Equip. Mitigation(2)**		**Control level**	**Details** 3 Maintain control 2 Improve if relevant 1 Improve mitigation 0 Priority actions
		FOOD sensitive area ?	Access controlled?	Intrusion detection?	**Access controlled?**	Break-in detection?		
Exterior bulk storage [see 1.4.7] - Scenario 1	*[Reminder of recommended mitigation measures: 1.4.7.Avoid storage outside as much as possible ; Secure that which has to be (eg milk tanks) by effective locking systems.]*	O	N	N			0	No specific mitigation measure in the area
	Tanks				N	N	NA	No mitigation measure to limit access to exterior tanks
Exterior bulk storage [see 1.4.7] - Scenario 2	*[Reminder of recommended mitigation measures: 1.4.7.Avoid storage outside as much as possible ; Secure that which has to be (eg milk tanks) by effective locking systems.]*	O	O	N			2	Well identified and fenced area with limited access
	Tanks				N	N	NA	No mitigation measure to limit access to exterior tanks
Exterior bulk storage [see 1.4.7] - Scenario 3	*[Reminder of recommended mitigation measures: 1.4.7.Avoid storage outside as much as possible ; Secure that which has to be (eg milk tanks) by effective locking systems.]*	O	N	N			2	No specific mitigation measure in the area
	Tanks				O	N	NA	Secured access to exterior tanks (locked hatches)
Exterior bulk storage [see 1.4.7] - Scenario 4	*[Reminder of recommended mitigation measures: 1.4.7.Avoid storage outside as much as possible ; Secure that which has to be (eg milk tanks) by effective locking systems.]*	O	O	N			3	Well identified and fenced area with limited access
	Tanks				O	N	NA	Secured access to exterior tanks (locked hatches)

Example 2:

Computers in a control room that are used to drive production activities therefore meet this definition of sensitive equipment and the control room must therefore be considered a sensitive area.

It is therefore necessary to control at least the accessibility (or detection) of concerned computers or the accessibility (or detection) of the supervision room, ideally both.

2. Why a v3.1 ?

Among PFD© users some have always wanted (since v1.0) to extend their "Food Defense Plan" to **broad security**, beyond sole Food Defense.

This extension has always been possible, as the majority of broad mitigation measures are security measures not exclusive to the protection of the food chain.

The feedback from v3.0 however shows that a more structured extension of the PFD© to global security, particularly with regards to sensitive areas, would today meet a need expressed by a growing number of users: this is the challenge of the **PFD©v3.1**.

3. What's new ?

The new features are found exclusively in the "Sensitive areas" sheet with :

1. The definition of a sensitive area in terms of security:

   Damages on working equipment or facilities (fire, breakage…) in this area could significantly impact production or could lead to significant product losses.

2. The integration of a **Security Sensitive area** column, which now makes it possible to manage sensitive areas in terms of product safety ("Food Sensitive") and sensitive areas in terms of broader security criteria ("Security Sensitive"), which are not specific to product contamination risks, but risk mitigation strategies (accessibility, detection) being the same.

Security sensitive area?	
Y	Damages on working equipment or facilities (fire, breakage…) in this area could significantly impact production or could lead to significant product losses.
N	Damages on working equipment or facilities in this area would have a limited impact on production and/or products.

4. Is migration towards v3.1 mandatory?

Of course not! This version aims in priority at supporting sites that wish to implement an extended approach to malicious acts mitigation.

Please note: as of **April 15, 2021** all our Food Defense trainings to new user companies will be delivered by default on the basis of PFDv3.1.

5. What are conditions for data migration?

A migration towards v3.1 will need support from our team who will transfer the data from your current file to the v3.1 file, in total confidentiality of course.

6. What is PFD©v3.1 cost ?

The cost of a **new license** is maintained at **€350** (excluding VAT), under the same conditions as for v3.0: a license is granted for an unlimited period of time for a given site, with a license holder who can change over time as long as he/she is trained. The license is paid for once, with no additional annual cost.

For a company wishing **to move from a previous version of PFD© to v3.1**, the cost of the migration will depend on the version of the initial file and the number of files to be migrated: contact us to discuss together migration conditions and costs.

7. When will v3.1 be available ?

V3.1 is now available.

You can already contact us now to discuss the migration or acquisition of v3.1 for your company...

Contact-us to move forward together : exaris@exaris.fr

and **meet us on www.exaris.fr**