#### UNITED STATES DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE WASHINGTON, DC

# **FSIS NOTICE**

28-06 4/20/06

## PBIS PROFILE EXTENSION INSTRUCTIONS ON FOOD DEFENSE PLANS FOR MEAT AND POULTRY ESTABLISHMENTS

# I. PURPOSE

This notice provides instructions to the Inspector-in-Charge (IIC) at meat and poultry establishments for completing a profile extension about an establishment's food defense plan. This profile extension will provide the Food Safety and Inspection Service (FSIS) with an overview of how establishments are addressing food defense and will enable FSIS to establish a national baseline. IICs will receive a PBIS alert to complete the food defense profile extension for the purpose of determining whether there is a trend in establishments of adding or improving food defense plans.

**NOTE:** A separate notice will be issued for import, export, and egg processing establishments to complete a food defense plan profile.

### II. BACKGROUND

A food defense plan is a document that sets out control measures developed by an establishment to prevent intentional adulteration of product. A food defense plan should be developed, written, implemented, tested, assessed, and maintained if it is to be functional. All establishments are encouraged to operate with a food defense plan. The Agency has developed guidelines on the elements of a food defense plan, and they are available on the FSIS web site at <u>http://www.fsis.usda.gov/pdf/Elements\_of\_a\_Food\_Defense\_Plan.pdf</u>. While not required by regulation at this time, FSIS does believe all establishments should have a food defense plan to prevent intentional contamination of product.

IICs were instructed in FSIS Directive 5420.1, Revision 2, "Homeland Security Threat Conditions Response – Food Defense Verification Procedures," Section VIII, to have a meeting with establishment management to discuss food defense plans. At the meeting they were to discuss whether the establishment has a food defense plan that is written, implemented, tested, assessed, and maintained to address the means by which intentional product contamination

<b>DISTRIBUTION:</b> Inspection	NOTICE EXPIRES: 5/1/07	OPI: OPPED
Offices; T/A Inspectors; Plant Mgt;		
T/A Plant Mgt; TRA; ABB; TSC;		
Import Offices		

can be prevented. IICs were to document what was discussed in the meeting in a memorandum of interview and to maintain the memorandum in the file.

The profile extension that IICs will receive, via a PBIS alert, will ask a series of questions that should be answered by reviewing a copy of the establishment's written plan and associated records.

**NOTE:** An establishment is not obligated to provide a copy of its written plan. It can provide a copy to inspection program personnel if it chooses to for inspection program personnel to use to complete the survey. If the establishment shares its plan, **do not keep or make copies of the written plan**. Ensure that the plan is not shown to or shared with any outside source because it may contain sensitive security information.

# III. PBIS PROFILE FILE EXTENSION INSTRUCTIONS

After receiving a PBIS alert to complete a food defense profile extension, inspection program personnel will follow the instructions below to answer questions pertaining to the establishment's food defense plan. Inspection program personnel are to review the food defense profile extension at least every 120 days as indicated in FSIS Notice 04-05.

**NOTE:** You should base your response to survey questions on the written food defense plan if it is volunteered by the establishment. Some profile questions may be difficult to answer even upon reviewing the written plan. If the answer still cannot be determined, it is most appropriate to select the radio button next to – **UNKNOWN**.

A. To access Establishment Profile Extensions, select the following from the PBIS pulldown menu - File/Update/Establishment Profile Extensions. After PBIS establishes an FSIS intranet connection, a web-based Establishment Profile Extension window will appear. Select the Food Defense Profile Extension from the dropdown list of options.

B. If the establishment does not have a written plan, select the radio button next to -NO in question number 1. End the survey according to the instruction in section D of this part.

C. If the establishment has a written plan, select the radio button next to - **YES** in question number 1 and continue to answer all of the questions in the profile extension.

D. When the profile extension is complete, click the **SUBMIT** button to save the entries in PBIS. Click the **EXIT** button to close the Establishment Profile Extension screen and return to PBIS.

NOTE: Inspection program personnel can share the survey and their responses to the survey with the establishment.

Plinip S dufter

Assistant Administrator Office of Policy, Program and Employee Development