

Training Manual	
Subject: Food Defense	Number: 5.028

Objective, Purpose & Scope:

Food defense applies to all facilities to ensure:

- That only authorized personal have access to manufacturing and storage areas
- That sensitive processing points are protected from intentional adulteration
- That raw materials, packaging, equipment and hazardous chemicals are securely stored
- That finished product is held under secure storage and transportation conditions

The Wiskerchen Cheese Crisis Management Team or its members shall address the maintenance and concerns regarding the Food Defense program and its implementation.

I. Training

Employees at each facility shall be trained on food defense principles on an annual basis. Employees shall also be trained to notify their department heads/plant management/quality assurance if they observe any unusual activity or unattended visitors/contractors wandering around the facility.

A. Food Defense Principles

1. Every employee is responsible for being alert and practicing responsible conduct to protect themselves as well as company assets.
2. Employees are responsible for ensuring visitors and contractors follow security procedures at all times.
3. The possession of unauthorized weapons or explosives on company premises or carrying them while on company-related business is strictly prohibited.
4. Visitors and Contractors shall wear identifying smocks in a visible manner at all times while on company premises.
5. The unauthorized use of photographic, video and recording equipment is strictly prohibited.

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B. FIRST Training

Employees shall be instructed in the FIRST method of awareness concerning food defense.

F – Follow company food defense plan and procedures

I – Inspect your work area and surrounding areas

R – Recognize anything out of the ordinary

S – Secure all ingredients, supplies and finished product

T – Tell management if you notice anything unusual or suspicious

II. Access Control

A. Entrances

Each facility shall limit the number of entrances to its premises. All doors to the facility that do not function as an entrance shall be installed without an exterior latch.

1. Entrance Monitoring

a. Entrances that are monitored by a designated employee can remain unlocked during normal business hours.

b. Entrances that are not monitored by a designated employee shall be locked and accessible either through a key code or a coded swipe card.

c. All entrances to the facility not monitored by a designated employee shall be monitored through the use of security cameras.

2. Overhead Doors

Overhead doors shall remain closed and latched unless they are in use.

B. Security Cameras

Security cameras shall be placed throughout the facility to provide a video record of key areas where potential product tampering could occur.

C. Wells/Water Supply

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Access to the facility water supply shall be limited through the use of locked doors in the case of a water supply room and locked chain link cages with barbed wire in the case of wells.

1. Well Monitoring

Facilities with wells shall monitor the wells daily for tampering. If there are any signs of activity at the well heads it must be reported to plant management and the Quality Assurance Manager for investigation.

D. Chemical Storage

The chemical supply area shall be secured and separate from the processing areas with appropriate ventilation to control fumes. Access shall be controlled through locks (key or pad lock), a key code, or a coded swipe card.

1. Air-gas Storage

Exterior storage tanks for liquid air-gas shall be enclosed with locked chain link cages with barbed wire. The enclosures shall be monitored daily for tampering. If there is any signs of tampering at an enclosure it must be reported to plant management and the Quality Assurance Manager for investigation.

E. Equipment

Equipment shall be inspected prior to startup. Any evidence of tampering or contamination shall be reported to plant management/quality assurance prior to startup. During the day employees shall monitor equipment in their department for normal operations. Any unusual activity shall be reported.

III. Personnel

A. Employees

1. Identification

All current employees receive uniforms and security cards from the facility which serve to identify them. The Human Resource department has a database which includes the pictures of all active employees for positive identification. Quality Assurance

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maintains a listing of all active employees with their printed name, signature, and initials for sign off identification purposes.

2. New Employees

Potential employees are subject to a background check for suitability to work in a food processing environment prior to being offered employment at the facility. New employees are provided with temporary uniforms.

3. Personal Items

Employees are not allowed to bring personal items such as hand bags or back packs into the production areas.

B. Visitors/Contractors

All visitors and contractors shall sign in at the front lobby or the maintenance entrance and have their identity verified prior to conducting business inside the facility. Visitors and contractors shall sign a log book clarifying they have reviewed a copy of the plants GMP's. Visitors and contractors will wear a company issued smock to identify them as a visitor or contractor. Visitors will wear a grey smock and contractors will wear a dark blue smock. Visitors and contractors shall be restricted to non-production areas of the plant unless they are being monitored by a facility designated employee. Facilities have the right to inspect any bags or equipment containers that are brought in by visitors and/or contractors before allowing them into production areas.

1. Drivers

Drivers for milk and outbound/inbound loads shall be restricted to the intake break area and shipping and receiving dock. Employees in these areas shall verify the identity of the drivers and monitor their activity to ensure that they are not leaving the designated area or tampering with product. Plant management and quality assurance shall be contacted if there are any problems with drivers.

C. Mail

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All mail handling activity shall take place in a separate room away from the food production areas of the facility. Mail handlers shall have access to the U.S Post Office guidelines for suspicious pieces of mail and packages.

IV. Shipping and Receiving

A. Sealing

All inbound and outbound trucks shall be sealed with a numbered padlock or seal tag which matches the identifier on the Bill of Lading or Shipping Manifest. If a truck is missing a seal or the seal does not match what is displayed on the Bill of Lading/Shipping Manifest the driver will have to fill out a Shipping Security Log Report. The log report will identify the following:

- a. Date
- b. Carrier name
- c. Carrier address
- d. Carrier phone number
- e. Carrier fax number
- f. Driver's name
- g. Driver's license number
- h. An explanation of why the seal was missing or different from that shown on the shipping documents
- i. If the load was accepted or rejected
- j. The accepting personnel's signature
- k. The accepting personnel's printed name

If the driver cannot supply an explanation for their truck being unsealed or having a different seal than indicated the truck shall be rejected.

B. Inspection

All inbound and outbound trucks shall be inspected at time of receipt/ loading to ensure that the trucks and product are clean, free of infestation and at the proper temperature for the product to be shipped/ received per the inbound/outbound truck inspection procedure. Inspection required for evidence of potential security concerns such as torn or punctured cases, exposure to moisture or

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unusual odors. Personnel shipping or receiving goods shall check contents of the truck against the Bill of Lading/Shipping Manifest for any unaccounted for product. These checks shall be documented on the Bill of Lading or Shipping Manifest through use of a stamp. Any issues shall be reported to plant management/quality assurance. If there is evidence of unsatisfactory shipping practices, then the materials must be either rejected and returned, or immediately placed on hold. A risk assessment shall be carried out to determine the potential impact on the production site. Refer to QR-CP- Inbound and Outbound Truck Inspections

V. Storage

A. Raw Material, Ingredients and Packaging Storage

Raw Materials, ingredients and packaging shall be stored in their original containers or in properly marked containers to maintain lot traceability and the identity of the item being stored. Any suspicious activity around raw ingredients or packaging shall be reported to plant management/quality assurance. Suspicious activity includes things like unexplained bags or boxes being found out of their normal storage areas, opened bags and boxes, or visitors/contractors handling items without supervision.

B. In-process

Facilities shall keep an inventory of in-process product to identify and track any unexplained additions or withdrawals from stock. Items shall be visually inspected before their use to see that all seals are in place.

C. Finished Product

Finished product shall be sealed prior to shipping to prevent tampering or adulteration of the product. Finished product shall be compared against the purchase order for which it was produced to ensure that unexplained additions or withdrawals are identified and accounted for.

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