

## Vermont Food Emergency Response Plan Template

### **I. Introduction**

This is an Annex plan to SSF 8 and SSF 11. This annex describes roles that are different from SSF 8 and 11 Response Plans in that it deals with emergencies that start and end in the agricultural sector. VAAFMM is the lead coordinating agency for ESF 11 and those roles and responsibilities describe what agencies do to protect food, agriculture, and natural and cultural resources after all hazards events and disasters. In this annex, the food or agriculture problem IS the event. When inspectors respond to communities that suffer from floods or tornadoes, that is a response under ESF 11. This incident annex describes how we respond to incidents that start and end in the food and agriculture arena. Examples include an intentional or accidental food contamination event. The audience is internal responders in the primary or support agencies.

### **II. Purpose**

This purpose of this plan is to outline procedures and protocols for a food emergency response that will rapidly mitigate impacts to Vermont's complex and diverse food systems in the event of a food-related incident. The plan should ensure effective and coordinated communication between state, federal, and local responders, authorities and the public; facilitate rapid recovery following a food-related incident by identifying the scope of state involvement in recovery; specify duties, and roles, and responsibilities for those involved in the response; and finally, provide transition from response to recovery efforts.

### **III. Scope**

The plan outlines an emergency response to an intentional or accidental food contamination event that involves one or more of the following:

- widespread distribution or;

- large numbers of people affected or;
- high risk populations (children, prison system, elderly home care).

The Vermont Agency of Agriculture, Food & Markets (VAAFAM) and the Vermont Department of Health (VDH) have dual jurisdiction over incidents that affect the food supply. Support agencies include other State agencies, private industry, CDC, FDA, USDA FSIS, DHS, FBI, and Customs and Border Patrol. Inclusion of support agencies will be based on extent of the incident, involvement across state line, and availability of resources.

#### **IV. Situations**

The landscape of Vermont is diverse and primarily rural. Response to a food emergency may depend on environmental factors, local infrastructure, and geographical features.

Specific examples of situations that can impact a response:

- Local planning and preparedness capabilities
- Rivers or other navigable waterways
- Depth to ground water
- Schools
- Concentration of croplands, livestock, poultry or food processing facilities
- Food storage areas
- Mountainous terrain
- Available medical resources
- Major population areas
- Populations where limited English is spoken or cultural norms are a factor
- Regions susceptible to severe storms (e.g., hurricane) or other natural disasters

#### **V. Assumptions**

This section identifies assumptions that exist in response to a food emergency. The response to a food emergency will be a joint effort between VDH, VAAFAM, and Vermont Emergency Management (VEM). VAAFAM (SSF11) and VDH (SSF8) are part of the larger State Emergency Operations Center (SEOC), which integrates with other state, local and federal ICS during emergencies. Both VDH and VAAFAM are responsible for food safety surveillance and

identification of food emergencies that could affect Vermont. State health officials will be the primary group responsible for the identification and control of foodborne illness or disease outbreaks in human populations. During illness investigations, VDH is primarily responsible for coordination with other states.

Federal law enforcement will become the lead agency for the criminal investigation portion of a response if the food emergency is determined to be the result of a deliberate or criminal act. In the case where a criminal investigation is associated with an on-going illness investigation, integration/data sharing will be through the agreement VDH Office of Public Health Preparedness (OPHP) has with the FBI for such cases. The U.S. Food and Drug Administration (FDA), Centers for Disease Control and Prevention (CDC), and the U.S. Department of Agriculture (USDA) will support a state's response to a foodborne emergency.

Either the state Department of Agriculture (DA), Department of Health or other state agency with food or agricultural safety responsibilities will be responsible for environmental health inspections of retail food markets, food processors, dairy farms and plants, retail and custom meat establishments, shellfish harvesting and monitoring of water quality in shellfish harvesting areas.

The following assumptions may apply to a food emergency event:

- Threats to the food supply can come from natural sources, as well as deliberate acts. This plan may be used to respond to food-borne emergencies, regardless of the cause
- The farm-to-table pathway has multiple entry points for contamination and may provide easy access to implementing a foodborne attack
- An effective and coordinated response effort will be needed to restore the public's confidence in the food supply in the aftermath of a contamination event
- Tracing may be difficult due to the lack of a uniform regulatory system that would insure the traceability of all products and commodities, regardless of origin

- The receipt of a threat against the agricultural community, in and of itself, could initiate response actions at all levels of government and may impact the general public
- Positive detection of a foodborne emergency in an area outside of Vermont will prompt this state to employ additional preparedness measures to prevent the possibility of occurrence in this state
- A deliberate act of contamination may have grave consequences, and encompasses a variety of response actions at all levels of government, industry, producers and the private sector
- Vector/contamination control may require discarding large quantities of agricultural products and organic matter, invoking embargoes or trade restrictions, culling livestock or poultry, and identifying alternative sources of food
- Depending on the causative substance of the contamination, contaminated foodstuffs may need to be considered and handled as hazardous waste
- Suspected infected locations, machinery, distribution centers, restaurants, eateries and transport vehicles may need to be cleaned, disinfected, and re-evaluated for contamination

## **VI. Concept of Operations**

### **A. Incident Identification**

VDH and VAAFM are responsible for food safety surveillance and identification of food emergencies that could affect Vermont. Identification of a food emergency incident will rely on the statewide surveillance systems that both agencies have in place. These surveillance systems include:

- Nationwide Systems: PulseNet and FoodNet.
- Consumer complaint reporting to VDH and VAAFM.
- Self-diagnosis complaints to Food and Lodging; two or more illnesses trigger a referral to the Division of Health Surveillance for case interviewing.
- Maple contamination to Consumer Protection.
- Meat contamination to Meat Inspection.
- VDH lab reports of confirmed cases to Health Surveillance.

- Reportable disease reporting to both Agencies.
- Meat inspection sampling protocols for Campylobacter, Salmonella, and E. coli.
- Poison Control Centers in New England reporting suspicious patterns of illness.
- Tissue residue surveillance through in plant testing and submission to NARAD.
- Water sampling of public water systems and private wells supplying water for food processing.
- Animal Health surveillance for Chronic Wasting Disease and Avian Influenza.

Observations that could indicate a food-related incident has occurred include:

- Discovery of unusual findings during routine monitoring and laboratory surveillance of food supplies
- Discovery of some physical characteristic of a food item or agricultural product that suggests possible contamination with a biological or chemical agent (e.g., presence of an unidentified and unexpected powder, a bad odor or an abnormal taste)
- Reports of unusual clusters or types of illness among employees or consumers, possibly related to a food or agricultural product
- Observation of suspicious behavior or activity by an employee or customer
- A significant security breach in a food-system facility, storage tank or shipping vehicle, or receipt of a threat indicating that an agricultural or food product has been or will be contaminated
- Two or more of these events occurring simultaneously

#### B. Incident Management

Dependent upon the level of the incident, the SEOC may need to be activated. Representatives from VDH, VAAFM, and VEM will be present in the SEOC for food and agricultural emergencies to ensure rapid activation of multiple Emergency Support Functions, if the need arises. In all food and agricultural emergencies, communication between departments will be critical to assuring the best possible response.

The response to a food emergency will be a joint effort between VDH, VAAFM, and VEM. VAAFM (SSF11) and VDH (SSF8) are part of the larger State Emergency Operations Center,

which integrates with other state, local and federal ICS during emergencies. A minimum of ICS 100 and 200 training is needed for all responders. ICS level 300 and 400 training is required for all section chief assignments in order to implement an efficient response.

VDH has a Health Operations Center (HOC) that would be activated in the event of a food emergency, and ICS roles would be clarified at that time depending on the context of the emergency. Within VAAF, ICS assignments are made by program management level employees who have expertise in the commodity involved and who have obtained an adequate amount of ICS training to make assignments appropriately. If the SEOC is activated, communication between HOC and VAAF EOC would happen through that, and if not, key employees in both organizations would communicate directly. Regardless of the level of activation and communication between exempt personnel, it is agreed that consistent communication between classified employees who are subject matter experts in both departments is critical to a successful response.

The level of mobilization of Vermont resources and the level of activation of this plan would depend on epidemiology traces initiated in the index state(s) and whether those traces result in impacted product being present and available for human consumption in Vermont. If Vermont was confirmed to have contaminated product, then VDH and VAAF would communicate and collaborate to initiate surveillance and other mitigation actions. If the scope of the incident overwhelms Vermont resources, Vermont would rely on EMAC for mobilization of surge capacity resources.

If the investigation is multi-state, FDA or equivalent federal entity will stand up their own ICS structure and take the lead. FDA's scope of authority is limited to food processing, drugs, medical devices and animal feed. If the investigation is limited to Vermont, jurisdictions would remain as has been described at the state level, and FDA or other federal agencies would act as a resource to state officials.

### C. Response actions

During human illness investigations, VDH is primarily responsible for coordination with other states. Either VDH or VAAFM will be responsible for environmental health inspections of retail food markets, food processors, dairy farms and plants, retail and custom meat establishments, shellfish harvesting and monitoring of water quality in shellfish harvesting areas. Generally, VDH has authority over any establishment where food processing occurs (non-meat products) and VAAFM has authority over establishments that produce and/or market raw food products and all meat and poultry products, but there are areas of overlap as well as establishments that do not fall under either department's authority due to voids in regulations. For instance, small processing facilities that sell less than \$10,000 worth of product annually could be exempt from VDH oversight, and neither department has clear responsibility for juice, cider, wine or beer, and neither department currently regulates sanitation practices in maple or shell egg production facilities.

Existing legal capabilities of each agency dictate possible response actions. Specifically, VAAFM has the legal authority to quarantine animals or animal products for disease containment purposes, has the authority to detain meat products in commerce, issue injunctions, stop milk shipment, and suspend licenses.

Some of the possible actions that VDH and VAAFM may need to plan for and implement include, but are not limited to:

- Identifying the need to implement a coordinated response to the incident following standard operating procedures and guidelines.
- Assessing the human health and environmental impact of the incident.
- Determining what types of incident surveillance is needed.
- Assessing the need to form and activate appropriate strike teams or incident response teams. The state should assess the need to form and activate geographic divisions for the response. These divisions may be specifically tasked with quarantine, surveillance, outbreak investigation, vector control, movement controls, disposal, or cleaning and disinfection.
- Assessing the need for federal support or support from other states.
- Assessing the need to relax or modify existing state regulations to support the response efforts.

- Assessing the types of public information required and the mechanisms to deliver that information.
- Assessing the potential for environmental contamination.
- Evaluating economic implications and consequences.

#### D. Communication

Conveying a consistent accurate message to all stakeholders during a food emergency is the joint responsibility of VDH, VAAFAM and VEM through their respective PIOs and the JIC. This takes considerable coordination and requires communication with industry organizations such as NOFA, UVM Extension, the Fruit and Veggie Growers Association, Retail Grocers Association, etc. Because these organizations maintain updated member lists, messages will be imparted to them so that they can relay information to individual producers, processors and retailers. The Vermont Food Safety Task Force would also be utilized for transmission of information to individuals who could be impacted by the emergency. VAAFAM will utilize the Animal Agriculture Alert Network, which will facilitate transmission of messages from lead agencies to VT feed retailers and in turn their customers.

Some communication capabilities are currently missing and may limit the efficient sharing of important information. These include message maps, pre-determined messages, adequate communications personnel (VAAFAM), lack of significant presence in social media or protocols for utilizing these tools (VAAFAM), inability to blast electronic messages to the private sector and support NGOs/retail businesses, and lack of registration requirement for all food producers/establishments that would otherwise facilitate immediate messaging to those entities.

Efficient and accurate communication is also important in instances where the food emergency involves pre-harvest food production that does not impact human health, such as incidents of BSE or Foot and Mouth Disease outbreaks. In emergencies such as these, VAAFAM will be the lead in coordinate messaging, with assistance from VDH. Public reaction to these diseases will result in a decline in meat and milk consumption, which could negatively impact those industries.

Messaging will focus on providing accurate information about these diseases as well as reassuring the public that the food supply is safe.

Effective communication between all affected parties during a food emergency is critical. Routine communication between VDH and VAAFMM programs will be necessary. For larger events, the VDH Crisis and Emergency Risk Communication (CERC) Plan may be activated by the VDH Communication Office for disseminating information to the public and any affected populations.

#### E. Response Coordination

In the event that contaminated food is isolated to Vermont, the lead State agencies that will support a response include VDH, VAAFMM, and the Agency of Natural Resources through its Department of Environmental Conservation. If the incident involves multiple states or countries, the lead federal agencies that will support a response include the FDA New England office, CDC Headquarters office (for laboratory or public health issues), the Environmental Protection Agency (when incident involves large scale water and pesticide contamination issues), and the New England Poison Control Center, which is responsible for submitting weekly food borne illness reports to VDH Epi personnel. Federal law enforcement is the lead agency for a criminal investigation, and the Vermont Office of Public Health Preparedness has an agreement with the FBI for data sharing in criminal cases such as intentional introduction of a contaminant to the food supply.

If a food emergency event requires support from agencies other than VAAFMM and VDH, VEM will activate the SEOC to coordinate a multi-agency response, and the ICS structure may expand or contract to accommodate the scope of the emergency.

The coordination and allocation of resources will be done through the Ag EOC/HOC or the SEOC if it has been activated. Available resources include: PPE, sampling equipment/materials/kits, laboratory diagnostic equipment, portable communication devices (cell phones with data plans), disinfectant, retained or condemned food material disposal capacity, thermometers, chemical test kits, state funded transportation, credentials, GPS units, dart gun,

captive bolt , bone saw, brain stem harvesters . Specialized services needed for contaminated food disposal and denaturing of food will be contracted on a case-by-case basis.

If the scope of the food emergency overwhelms in-state resources, a request for out-of-state resources could be requested via the SEOC by completing an Action Request Form (ARF) and working through the EMAC.

In all instances when coordination is necessary between VAAFMM and DOH, pertinent program managers in both agencies will maintain direct lines of communication to ensure that the response is timely and efficient. This will be critical to the success of both agencies' essential response tasks, including food-borne epidemiologic investigations, laboratory functions, sampling team activities, field evaluations, risk assessments, and toxicology related investigations.

The private sector also plays a critical support role during a food emergency response, and the lead agencies expect that they would cooperate in the following manner:

- Provide supply chain information if requested
- Provide patron or customer contact information if requested
- Communicate critical accurate messages to the public during a food emergency or outbreak

#### F. Interstate Coordination

When incidents require support from outside states, an interstate coordination liaison should facilitate incident management and policy coordination. This liaison should be identified from within the lead agency and closely coordinate efforts with Incident Command. The principal functions and responsibilities of the lead agency liaison should include:

- Ensuring that each agency involved with incident management activities is providing appropriate situational awareness and resource status information
- Establishing priorities between states
- Acquiring and allocating resources required by incident management personnel in concert with the incident command (IC) or unified command (UC) involved

- Anticipating and identifying future resource requirements
- Coordinating and resolving policy issues arising from the incident
- Providing strategic coordination, as required

## **VII. Assessment Control and Containment**

### **A. Food Emergency Response Teams**

As the scope of a food emergency expands, it may become necessary to form and activate strike teams (food emergency response teams) to address specific response tasks. These teams may be charged with tasks appropriate to the response, such as: surveillance, sampling, product recalls, trace-backs, disposal of contaminated materials, decontamination and disinfection, evidence gathering, quarantine or embargo, security, public education, sample analysis, or any other operational aspect of mitigating a food emergency. Under ICS, response team roles and responsibilities fall under Planning and Operations. The expertise and agencies represented on a team will be a direct function of the assigned response-specific tasks. Generally, a team should include experts in the following aspects of the emergency: technical or science, policy, media relations, communications staff, etc. Specific examples of appropriate personnel might include, but are not limited to, epidemiologists, law enforcement personnel, food inspectors, samplers, FDA or FSIS personnel, representatives of the lead agency, etc.

### **B. Foodborne Disease Surveillance and Outbreak Investigations**

Routine public health surveillance provides continuous monitoring for cases and outbreaks of human illness from any cause, including foodborne illness. VDH is responsible for this activity and relies on local health providers and hospitals for reportable disease data.

Hospitals, private healthcare providers and poison control centers contribute to public health surveillance by reporting cases of foodborne illness to VDH. The VDH Laboratory performs some primary and confirmatory testing and support epidemiology through characterization and typing of bacterial isolates.

### C. Foodborne Contamination or Adulteration Surveillance and Investigation

If VDH identifies an incident (e.g. illness) or a disease outbreak that is associated with food, an investigation will be implemented to determine the extent of the illness (e.g., severity and number of cases), the suspected food source, and the scope of the situation. VDH will work with state food safety officials at VDH and VAAFMM to coordinate the human health and food product investigations. This coordination may involve state epidemiologists, environmental health programs, and laboratory resources.

### D. Food Safety Surveillance

Food safety is generally monitored by group of field inspectors and staff trained or licensed to inspect all facets of the food distribution system after harvest to assure consumers that food is safe for consumption. Inspectors from VDH and VAAFMM are placed throughout the state and can respond to and investigate food safety activities.

VDH and VAAFMM food safety programs will be responsible for food safety activities, which may include:

- Inspect state-licensed or other facilities associated with a suspected or confirmed foodborne illness
- Assist with the recall of products
- Trace forward and back products with suspected ingredients
- Take field actions to mitigate the incident (embargo, close facility)
- Coordinate with animal or plant production or other food safety agencies or groups if the investigation requires access to or examination of raw food products
- Collect and submit food samples for laboratory testing for ongoing surveillance and to support regulatory actions

### E. Laboratory Services

The roles and responsibilities of the laboratories used during a food emergency must address the need for clinical, food, and environmental sample analysis. States should identify the laboratories capable of testing for specific agents (chemical, physical, biological or radiological) in both human and animal populations.

Laboratory Tasks Include:

- Provide analytical testing of food, environmental, animal and human clinical samples for pathogens, toxins and chemicals
- Maintain capability for conducting analysis using rapid, precise and accurate methods
- Perform complex food analyses with high precision and accuracy at an elevated throughput rate for extended periods of time
- Coordinate information and data sharing with food, animal and human health laboratory networks, such as the FERN, NAHRS, LRN and ICLN
- Provide timely reports of laboratory results
- Maintain chain-of-custody
- Provide sample collection tools, equipment and guidance to field investigators

## **VIII. Recovery**

### **Sample recovery topics and general elements of a recovery plan -**

- Public information policy and procedures
- Media relations planning
- Financial assistance
- Prepared statements for state department officials
- Prepared statements for the governor
- Alternate transportation plans
- Environmentally sound disposal of contaminated materials
- Ongoing communication with impacted private sector entities

### **Topics that should be addressed in Recovery:**

- Determine what continued surveillance is needed and the timeline for continued surveillance
- Determine the conditions under which recovery would be complete
- Identify all areas involved with the response that require recovery activities and support
- Provide access control to the affected zone and remove access control when possible
- Remove controls on food, water, crops and livestock when possible
- Involve community and social service agencies
- Maintain continuity of government
- Restore essential food production and retail services
- Track costs for reimbursement
- Respond to the media and communicate with the public to address concerns and/or rumors
- Host official visitors and delegations
- Conduct hazards evaluations to ensure safety of response teams and the public
- Resolve long-term issues related to pre- and post-harvest food production impacted by the food emergency
- Encourage immediate business recovery
- Foster long-term economic recovery
- Identify gaps and initiate repair of response plan

## **IX. Principal Parties**

### Sample Tasks -

- Define restrictions on interstate commerce
- Obtain additional resources, as necessary
- Implement an embargo on contaminated products
- Request voluntary product recalls
- Consult with federal, state and local authorities regarding response and food safety threat warnings
- Define the affected area
- Direct and/or assist with disease prevention and food safety activities, including quarantine, embargo, product recall, evaluation, slaughter, disposal, cleaning and disinfecting,

epidemiology, trace-back, trace- forward, vector control, and transportation permitting arrangements

- Define training requirements for employees of support agencies involved with emergency response operations
- Prepare information for dissemination to the public, producers, processors, and other concerned groups

## **X. Administration**

All agencies and organizations included in this plan should provide annual training to their staff assigned to implementing the plan. In addition, if a food emergency response team is included as part of the food response plan, that team should receive training as a team at least annually. Ideally, this training will consist of tabletop or functional exercises of the FERP.

## **XI. Plan Development and Maintenance**

This plan should be reviewed at least annually. Additionally, the FERP's contact list should be updated whenever any changes to key individuals are made. Key individuals should be noted on the contact list. Responsibility for plan updates and maintenance should be placed with an individual of appropriate authority, within the lead agency.

The Food Emergency Response Plan should be exercised on an annual basis. Retraining of response team members and agency and organization staff should be based on lessons learned while exercising the plan. New employees also should receive training so that they are able to carry out their respective duties in case of a food emergency. New employee contact information should be updated and delivered to all departments that will use the food defense plan.