

VERMONT AGENCY OF AGRICULTURE, FOOD & MARKETS
FOOD SAFETY CONSUMER PROTECTION DIVISION
Meat Inspection Service
MONTPELIER, VT
Ansons Tebbetts, Secretary



MIS DIRECTIVE

5500.2

8/21/23

Revision 7

SIGNIFICANT INCIDENT RESPONSE

I. PURPOSE

This directive outlines the procedures that the Emergency Management Committee (EMC) is to follow while managing a non-routine incident. A significant incident is one that presents a grave, or potentially grave, threat to public health, to the safety of VAAFM-regulated products, or VAAFM personnel. VAAFM is revising this directive to further clarify when a non-routine incident (e.g., natural disaster) becomes a significant incident and may require the creation of an incident report (IR). This directive also outlines the internal VAAFM communication protocol for threats to the food and agriculture sector that may lead to a significant incident.

II. CANCELLATION

VT Directive 5500.2, Revision 5 Significant Incident Response, 10/17/11

FSIS Directive 5420.2, Revision 1, Homeland Security Threat Condition Response – Handling of FSIS Laboratory Samples Under Declared Heightened Threat Conditions, 1/26/05

FSIS Directive 5420.5, Revision 3, Homeland Security Threat Condition Response – Intelligence Reports and Communication, 7/16/10

FSIS Directive 5420.6, Revision 1, Homeland Security Threat Condition Response – Information Technology Monitoring Procedures, 1/26/05

FSIS Directive 5420.7, Revision 1, Homeland Security Threat Condition Response – Human Health Monitoring and Surveillance, 1/26/05

FSIS Directive 5420.8, Revision 1, Homeland Security Threat Condition Response – Communication and Public Affairs Procedures, 1/26/05

III. BACKGROUND

A. A significant incident presents a grave or potentially grave threat to public health involving VT-regulated product. Examples of significant incidents include but are not limited to the following:

1. life-threatening, human illnesses potentially implicating VT-regulated product that lead to a foodborne illness investigation, as described in VT Directive 8080.3, Food Borne Illness Investigations;
2. Class I recalls resulting from one or more illnesses involving VT-regulated product or if a Recall Committee is unable to reach consensus on whether the Agency should request that a company conduct a recall;
3. intentional contamination of VT-regulated product;
4. An incident reported in a National Terrorism Alert System (NTAS) alert issued, updated, or revised by the Department of Homeland Security (DHS) is determined to pose a risk to VAAFMM personnel or the food and agriculture sector;
5. A foreign animal disease as described in VT Directive 6000.1, Responsibilities Related to Foreign Animal Diseases and Reportable Conditions, is detected in animals presented for slaughter within Vermont and/or the United States (U.S.);
6. Detection of an animal disease with potentially significant public health implications for VAAFMM-regulated products by VAAFMM Public Health Veterinarians or other government source;
7. Ineligible foreign product in the United States (U.S.) where there is a reasonable probability that the consumption of the product will pose a serious health hazard,
8. High risk products in the U.S. as identified by Customs and Border Protection;
9. Suspicious activities observed by program personnel while performing their normal duties.
10. Illegally imported or smuggled products in the United States (U.S.) where there is a reasonable probability that the consumption of the product will pose a serious health hazard;
11. Non-routine incidents (e.g., Food and Drug Administration enforcement actions, or law enforcement) to protect public health (e.g., stolen trucks, findings of excessive levels of chemical residues, preparation for and support of a Special Event/National Special Security Event) involving the adulteration, or potential

adulteration, of VAAFM-regulated product, which requires significant coordination, sharing, or expenditure of resources among program areas and other regulatory agencies.

B. Additional situations that VT may consider as non-routine incidents include:

1. natural disasters (e.g., hurricanes, tornadoes, earthquakes);
2. terrorist attacks on the nation's critical food and agriculture sector infrastructure;
3. other incidents requiring a national coordinated response that result in the activation of the Emergency Support Function -11 (ESF-11) or State Support Function – 11 (SSF-11), which is described in the Agriculture and Natural Resources Annex to the National Response Framework; and

IV. NOTIFICATION OF THREAT FROM INTELLIGENCE COMMUNITY

1) All VAAFM personnel need to know the protocol for communicating threat information that may be related to the food and agriculture sector. Threat information from the intelligence community is to be communicated through the following:

- a) The VT State Veterinarian or Vermont Secretary of Agriculture, Food and Markets, or designee, is the primary point of contact for receipt of threat information from the intelligence community (e.g., Department of Homeland Security);
- b) If a threat has the potential or is expected to affect food or agriculture, the VAAFM Directors will be notified;
- c) The Secretary will determine the appropriate distribution of the threat information in coordination with the Meat Inspection Chief of Inspection and ensure employees, stakeholders, and the public are notified, as appropriate; and
- d) In the event of a significant incident, the VAAFM AgOC may be alerted or activated and other response actions taken pursuant to this directive.

2) Program supervisors are to ensure that any notifications distributed pursuant to this directive are available to inspection program personnel (IPP) in the establishment.

3) As soon as program supervisors are notified of threat information, they are to inform establishment management of the alert. Supervisors are to document their discussion with establishment management in a memorandum of interview (MOI) (see [VT Directive 5010.1](#), *Food Safety Related Topics for Discussion During Weekly Meetings with Establishment Management*).

D. VAAFM personnel observe a potentially significant incident, they are to report it through supervisory channels.

V. AGENCY PERSONNEL RESPONSIBILITIES FOR REPORTING A SIGNIFICANT INCIDENT

A. Agency personnel are to immediately report any potential non-routine incident through supervisory channels. The information reported, at a minimum, is to include:

1. the name of the person who reported the incident,
2. date and time of the incident,
3. location of the incident,
4. the type of threat, hazard, or disease,
5. the type of product involved, and
6. number of reported illnesses and deaths (if applicable).

B. VT state personnel will work through State of Vermont supervisory chain, the State of Vermont Emergency Management SEOC or the AgOC to report incidences, depending on the current activation levels.

C. For Class I recalls resulting in one or more illnesses (Section V, 2 of this directive), the Agency will initiate and post the recall release in collaboration with the VT Dept. of Health (VTDOH).

VI. REVIEW OF THE INCIDENT

A. The Director of Food Safety and Consumer Protection, Head of Service, Meat Inspection Chief, Compliance Officer, or their designees, will review any reported incidences, and as appropriate, decide:

1. that no action is required at this time,
2. to alert the AgOC, or
3. to request activation of the AgOC.

B. If the group determines that no further action is necessary at that time, the incident will be documented as closed or pending, and saved in the Incident Folder in Sharepoint.

C. If the group determines that the incident may warrant further discussion, or needs action, the Secretary of Agriculture will be notified, a ticket will be created in WebOC

if the SEOC or AgOC is in activation status.

VII. EMERGENCY OPERATIONS CENTER (EOC)

A. The EOC is comprised of senior management personnel, or designee, from each of the VT State Support Functions (SSF). Each SSF representative has the authority to commit, as necessary, the resources of his or her respective function in responding to the incident. The EOC duty roster is available on DisasterLan. The list contains on-call members and contact information for each SSF.

B. The Agency may, at any time, on any day of the year, address and manage the response to a non-routine incident involving potentially adulterated or adulterated VT-regulated product. In the event the incident does not result in VT-regulated product adulteration, the purpose of the SSF-11 activation would be to determine how to work with other involved agencies to assign responsibilities for any additional information gathering, and how to best provide the public with information about the safety of the product.

C. The DEMHS serves as the Incident Commander (IC). The IC coordinates the work of the EOC in response to a particular non-routine incident. Depending on the nature, scope, and complexity of the incident, the IC may designate SSF 11 as IC to coordinate key activities critical to the management of the incident.

VIII. THE WORK OF THE AGENCY IF ADULTERATION OF VT REGULATED PRODUCT

A. The Agency evaluates the information provided on the Incident report and determines what further information is needed to complete the assessment of the non-routine incident. The Agency also develops and implements an incident action plan.

B. The Agency, acting as SSF-11 if activation of the EOC, coordinates the development of responses to questions about the incident, including responses to standard questions about illness prevention, hazard detection, incident containment, and remediation. This is done in coordination with the VTDOH.

C. When the incident has been resolved, the IC, in conjunction with the EOC members, will deactivate the EOC. The Incident ticket will be closed.

IX. DOCUMENTING IMPACT OF SIGNIFICANT INCIDENTS ON ESTABLISHMENTS, WAREHOUSES, AND IN-COMMERCE ESTABLISHMENTS

A. Agency personnel creates a spreadsheet to collect information about the operational status of official establishments and in-commerce facilities that handle VAAFM-regulated products (e.g. warehouses, distributors) affected by a

non-routine incident such as a flood, ice storm, earthquake or hurricane.

- B. Compliance personnel may need to contact other VAAFMM personnel, such as Program Supervisors, Food Safety Specialists, Enforcement, Investigations, and Analysis Officers; the Chief of Inspection or Headquarters personnel.

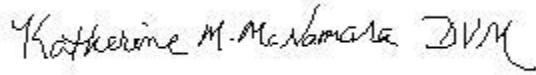
The following information is collected and documented on the spreadsheet:

- A. the official establishment numbers for non-operational official establishments or facilities;
 - a. the establishment names, location (city, state), establishment size, establishment type (Federal/Talmadge-Aiken), and slaughter and processing volumes are prepopulated
- B. the addresses of non-operational high volume distribution points (e.g.
 - a. wholesale grocery suppliers or transportation centers);
 - b. The contact information,
 - c. number of buildings impacted at high-volume distribution points (e.g., wholesale grocery suppliers or transportation centers) that are not operating.
 - d. Poundage of product(s) impacted, detained, or seized also needs to be entered.
 - e. If product was impacted, how was it disposed of.
- C. The reason why the establishment or facility is not operational:
 - a. a). Insufficient facility personnel present;
 - b. b). Damage from flooding;
 - c. c). Building destroyed;
 - d. d). No electricity;
 - e. e). Hazardous weather; or
 - f. f). Other (specify);
- D. Compliance personnel make contact with the establishments and facilities and update the spreadsheet each time there is a change in a facility's operational status. Daily updates are not needed if there is no change in status.
- E. If compliance personnel cannot make contact within 5 business days an Investigator will conduct a surveillance at the establishment or facility to ensure all regulated product is either unadulterated or properly disposed of.

X. COMPLIANCE RESPONSIBILITIES

- A. The Meat Safety Compliance and Enforcement Specialist (MSCES) is to develop an Investigative Response Plan within 24 hours for natural disasters or threats of natural disasters.

B. The MSCES is to ensure that a timeline is developed for Investigative and Response Plans (see [FSIS Directive 8010.2](#)). Personnel are to update the timelines daily.

A handwritten signature in black ink that reads "Katherine M. McNamara DVM". The signature is written in a cursive style.

Katherine M. McNamara, DVM
Assistant State Veterinarian
Meat Inspection Service