



Below are some recommended steps to strengthen your on-farm and facility security.

1. OFFICE AND PLANT SECURITY

Your first obligation is sit down with your company security staff and discuss where your facility may be vulnerable. If the facility backs on to wooded areas, be especially aware of these areas. Talk about lighting - both in and around the plant; locks on gates and doors, and who has keys or codes. Do you have TV cameras as part of your security system, and do they sweep outside areas? Do you have motion detectors outdoors as well as inside? Do you have foot patrols or patrol car drive-bys? Do you vary the frequency of these checks, or can you set your watch by them? How high are your fences?

Don't let facility security ever compromise employee safety - ever.

Trucks parked at plants or behind offices overnight are favorite targets for spray-painting, sand/sugar in gas tanks or vandalized engines. Park these vehicles as close to the plant as possible, under lights, in-sight of foot and car patrols, and near any kind of motion detectors. Locking gas caps make a lot of sense for the money. Remember: In some cases, trucks belonging to meat companies in the U.S. have been set afire.

Even the most routine office tasks become more important now. Make sure your office, accounting, legal and sales/marketing people all routinely back up their computer files so that if something happens to your system - pure accident or a sledgehammer to your server -- you're not dead in the water. Add extra firewalls and other security to your website and company computer system to frustrate hackers. Store backup files for your system in a fireproof area.

Also pay close attention to your mail and packages. If they appear suspicious for any reason, return them to the post office and have them checked by the postal security. Take precaution in opening all mail and ask your staff to open letters with letter openers rather than their fingers. In the past, several animal use companies have been targeted with razor blades placed in letters.

2. EMPLOYEE SCREENING

When it comes to employment, we strongly advise you sit down with your firm's lawyers to ensure you're protecting your company, but also safeguarding your employees' rights. Right-to-work and employee protections differ from state to state, so make sure you vet any new policies before you implement them.

Your HR Department should have a policy or a statement on your applications or during the interview for employment that states "all information provided is true and correct under penalty of perjury", etc. Since food production is part of the critical infrastructure of the U.S. and a key asset as defined in the Department of Homeland Security's [National Infrastructure Protection Plan](http://www.dhs.gov/xprevprot/programs/editorial_0827.shtm), http://www.dhs.gov/xprevprot/programs/editorial_0827.shtm, you should require that all applicants and employees (aliens included) provide accurate information about employment, as a matter of national security. It is recommended you go back to even current employees in phases to verify that all my employee data is correct and updated; just to alleviate any issue of discrimination.

During the seasons when day labor and temporary office help are often needed, it's especially important to screen all

new hires as thoroughly as possible. You don't have to be reminded about activist "plants" - animal rightists who gain employment to your company under false pretenses in order to secretly videotape operations, learn about security, etc.

Activists who take these "temporary positions" are often young (18-30ish); generally Caucasian; may use university/college ID instead of a driver's license for identification; are sometimes seeking work for a few weeks, so your situation "is just great for me"; drive cars with out-of-state plates, etc. Be especially vigilant if your facility is within an hour or so drive of a university or major city.

Ask for references, and check them closely. Look for previous employment in the same field. If you use a labor service or a temp agency, talk with them about your concerns and enlist their help in screening. Ask for workers or temps who are known to the agency or service. Be especially cautious of anyone who seems over-educated (or inappropriately educated) for certain positions, such as a college degree in a subject unrelated to animals yet wanting to work in a position in contact with them.

Even after you've completed your seasonal hiring, be vigilant. While you don't want to trample any one's legal rights, you do want to make sure your employees and your facility are secure.

Pay special attention to new or temporary employees who work unusually late or come in unusually early. Keep an eye on those who are seen, if only occasionally, in areas of the plant or office where their job normally would not take them. Don't take employees into parts of your operation where they normally wouldn't have access - even if they tell you "I've always wanted to see how that was done."

Pay attention to cafeteria or break room discussions about new hires who "don't fit in" or those who seem to be overly curious about the company for a temp or short-timer. "Plants" may even hang out with employees at a favorite watering hole, again usually to find out more about the company and how it operates.

Some questions to consider asking, or statements to make, on the application or during the interview process, again after consultation with your attorney, include:

- Have you ever legally, or otherwise, changed your name? If so, where, when and why? (As a note - the IRS would probably like to know if - Mr. Jason Smith aka John Knoldt aka Christopher Arnold Parrett, and aka Chris Paxton - properly filed his tax return for his employment under each name).
- Are you currently working for any organization that is paying/asking you to collect information related to our company proprietary procedures or processes? If so, please provide the name and contact information for the organization/person.
- Do you possess or use any equipment that you intend to have during work hours that can collect audio, video or still pictures? If so, please show us this equipment. Failure to do so is in violation of company policy (i.e. Section 2.3.004). Cell phones with cameras may be allowed, but your company should document who has them. You should have a policy that the audio/video or photography tools may not be used during work hours or on the property of your business without express permission from management. Include in your policies that use of such items could lead to confiscation of such items; otherwise, without it being a written policy, there are some legal restrictions on your ability to ask for, or take, such equipment.
- Have you ever observed an animal being subjected to treatment that you believed was harmful? Where, when and what did you do about that? (This question is designed to find out more about how the person handled the situation - you can interpret a lot from their reaction).
- Our company policy (i.e., Section 3.1.001) states that any employee who observes, or receives any information that indicates an animal is being treated or handled in a way that is contrary to our animal welfare policy/guidelines must immediately report that information to (Name of individual, etc.). Failure to do so is cause for dismissal and potentially subject to criminal charges.

3. EMPLOYEE TRAINING & ACCOUNTABILITY

Train all employees who interact with or handle animals to implement your company policies and procedures on animal handling and care. Have them sign a letter of agreement that they understand and agree to carry out your policies. The letter should also state the consequences for violating company policies, which ultimately could lead to termination and possible prosecution (see item *e* above). If they refuse to sign the letter, they should not be hired or should be terminated. All employees with access to and responsibility for caring for animals, new and existing, should be required to sign the letter.

Likewise, if possible, have employees sign a non-disclosure agreement to prevent the use of company policies or pictures from being used to benefit individuals or other parties. Therefore any pictures taken by undercover plants would legally not be able to be used against your company or at the very least, individuals would have violated company policy knowingly if they tape, record or photograph farm operations. This should be discussed with your attorney before implementing this policy, but it could serve as a valuable tool.

Also, include as a company policy, no use of electronic devices in areas where animals are maintained or handled. This would include cell phone cameras (see item *c* above).

Train your long time employees to be your "eyes & ears" for these kinds of behaviors as well and inform them they need to report such potentially suspicious behavior or conversations to management. They can be your key to recognizing a plant and preventing your company from being the next victim of animal rights set ups.

One approach to consider implementing, that has been successful in anti-terrorism preparedness, is to use the S.C.A.N system (See - Contact - Ask and Notify). If employees see someone who appears to be doing something out of the ordinary - in a place out of their ordinary duty area, acting oddly, fidgeting with a shirt or glasses, etc. that raises any flags, then next they should make contact with that person to ask if everything is OK or can you help them. If the person's response seems a bit off, then notify your supervisor or the owner. Better to be safe than sorry. Federal and municipal agencies use a variety of S.C.A.N. like capabilities to detect, catalog and neutralize various threats.

Also train your employees and inform them it is their duty and responsibility to report any mistreatment or mismanagement of animals to management. Any cruelty acts should be stopped and prevented if possible, but at the very least all such acts should be reported.

Lastly, periodically operate your own undercover operation to ensure animals are being handled properly and company policies are being implemented. An outside party could be hired for this service, or an employee could be trained to serve in this capacity.

Don't be paranoid, be vigilant.

4. RESPONDING TO ACTIVISTS' LETTERS

Should your company be the recipient of a letter or email from PETA, HSUS or another activist group either making suggestions about your farm operations - possibly suggesting they are aware of cruelty - do not agree to meet with their representatives as they request and do not respond.

First do your own review and investigation to ensure your policies are being carried out consistently by employees and that there are no problems. If any are found, immediately take action to end them.

Secondly, ignore the letter/email and do not respond - most likely they are on a "fishing expedition" to see if you will respond. But retain the letter and ensure your attorney has a copy.

Thirdly, if you feel the need to respond, contact the Animal Ag Alliance for assistance - we are glad to help you draft a response that helps close the door on future correspondence. If the letters or emails persist, and it is likely they will, continue the same pattern of action as previously suggested.

5. TALK WITH LAW ENFORCEMENT

Sit down and remind your local law enforcement authorities - city/town police and county sheriff - about the animal rights threat to animal ag generally and to your industry specifically during certain holiday seasons associated with your products.

Undercover employees, computer system sabotage, website hacking, spray-painting, vandalism, destruction of property, "liberation" of animals, threats of poisoning food products in grocery stores, etc. are hallmarks of radical animal rights efforts to stop your company from doing what it's supposed to do - sell products.

Talk with the police about a worst-case scenario - your company is hit and the police catch the perpetrators. Decide now if you're going to prosecute. What would the charges be? What penalties would the convicted person face? Remember, if explosives or arson are involved, it's a federal crime, with an investigation overseen by the Bureau of Alcohol, Tobacco and Firearms. If you have a meat processing facility or have animals on the premises and damage - whatever damage -- exceeds \$10,000, it's a violation of the federal Animal Facilities Protection sections of the federal criminal code, and the FBI may become involved. Make sure your local law enforcement authorities are aware of the federal predicates in these situations.

Don't fall prey to the assumption if you prosecute, you're a bigger target. Companies with "zero tolerance," those known to take a hard line on criminal activity, are not likely to be on the top of a "hit list."

6. TALKING TO THE PUBLIC OR MEDIA

Be ready to talk with the media and the public if you become a target. Have a designated company spokesperson chosen and have prepared statements ready. These statements should talk about your company's commitment to animal care and to providing affordable, safe food. Talk about your company's policies and training, and that no mistreatment of animals will be tolerated. Inform them you are conducting a thorough investigation of the charges and action will be taken if the charges are found to be true.

If you fund research into animal health, etc., mention these efforts. Make sure the public understands that your company - employer of local folks, contributor to the community, good citizen -- has been the victim of criminal activity, activity that jeopardizes the company and the community.

All of the above recommendations come under the general heading of *being prepared*. Not all apply to all companies in all situations. Be practical and use common sense. There's a small chance you'll be targeted. Operate under the philosophy that it's better to be prepared for the worst while you expect only the best.

If you have questions or need further assistance, you can feel free to call on the Animal Agriculture Alliance. Contact Kay Johnson Smith, Alliance Executive Vice President, at 703-562-1412 or KJohnson@animalagalliance.org.