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1.0 Assemble Food Defence Threats Assessment Team

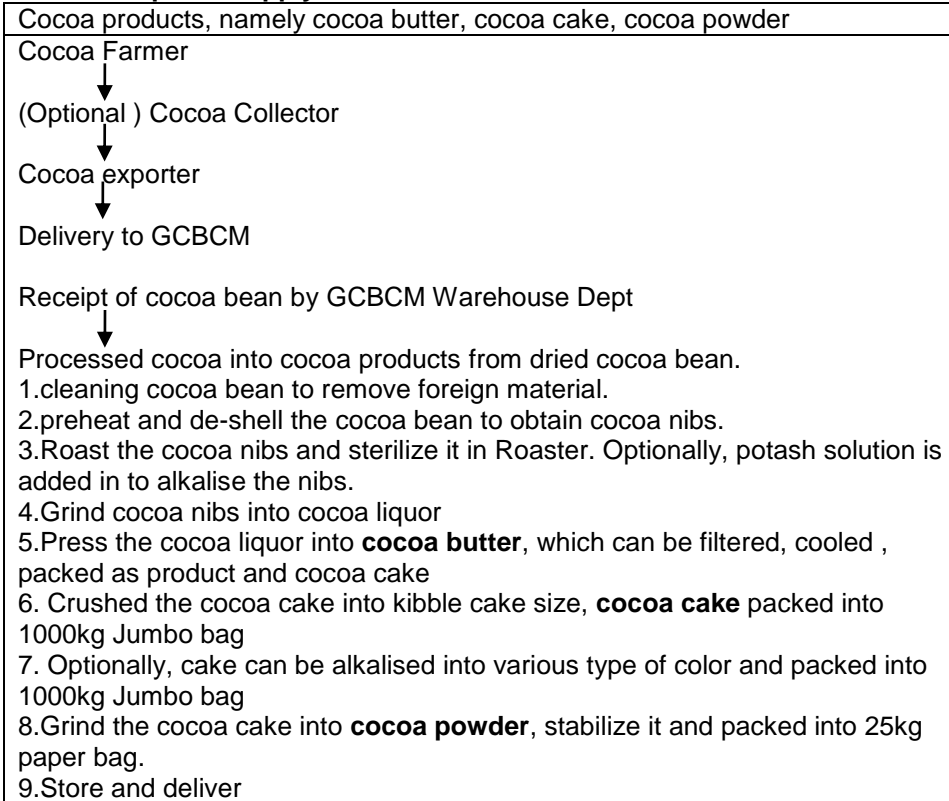
Name	Department	Signature	Date
Koo Chee Khoon	QA Dept		09-Jan-2023
Ting Bing Keh	Production Dept / Maintenance Dept		09-Jan-2023
Ravin	Production Dept		09-Jan-2023
Tenh Swee Kheng	Warehouse Dept		09-Jan-2023
Mohamad Syazwan bin Salim	QA Dept		09-Jan-2023

2.0 List of Products (or group of Products)

- Cocoa products, namely cocoa butter, cocoa cake, cocoa powder

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3.0 Map Out Supply Chain



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4.0 THREAT ANALYSIS: Identify potential threat - Evaluate threat - control measures

4.1 THREAT ANALYSIS – COCOA PRODUCTS

Step in supply chain	Identify potential threat	General Control Measures applied to prevent this threat	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
Cocoa Farmer	Historical Incidents: Adulteration of other material in cocoa beans at farmer such as other crop/spices that they grow – did occur – info from cocoa collector/exporter.	Cocoa collector/exporter do check on each bag of dried cocoa bean upon receiving from farmer. Collector/exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this threat. As for GCBCM control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	3	6	No	-
	Emerging concerns/news/alert: No threat identified	-	-	-	-	No	-
	Storage and distribution: Simple. Farmer is commonly small size grower, and store cocoa at their own home However, it is possible to have unintentional adulteration with other crop during storage, as the farmer may mix up with other crop they grow/dry.	Cocoa collector/exporter do check on each bag of dried cocoa bean upon receiving from farmer. Collector/exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this threat. As for GCBCM control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	3	6	No	-

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Step in supply chain	Identify potential threat	General Control Measures applied to prevent this threat	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
(Optional) Cocoa Collector	Historical Incidents: Adulteration of other material in cocoa beans at collector centre such as other crop/spices – did occur – info from cocoa exporter.	Cocoa exporters do check on each bag of dried cocoa bean upon receiving from cocoa collector. Exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this threat. As for GCBCM control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	3	6	No	-
	Emerging concerns/news/alert: No vulnerability identified	-	-	-	-	No	-
	Storage and distribution of supplier facility: Cocoa collector has bigger storage facility. They may process different crop also. Hence, it is possible to have unintentional adulteration with other crop during storage, as the collector may mix up with other crop they process	Cocoa exporters do check on each bag of dried cocoa bean upon receiving from cocoa collector. Exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this threat. As for GCBCM control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	3	6	No	-

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Step in supply chain	Identify potential threat	General Control Measures applied to prevent this threat	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
Cocoa Exporter	Historical Incidents: Adulteration of other material in cocoa beans at collector centre such as other crop/spices t – did occur - base on GCBCM test data	GCBCM control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	2	4	YES	<ul style="list-style-type: none"> Buy Cocoa Bean only from Approved Supplier, as per P-FT-002. Conduct Incoming Testing as per WI-QA-001.- Sampling 30% of all cocoa bean lot. Test adulterated waste vs contractual “waste” specification Direct apply discount against supplier invoice for over specification of (adulterated) waste, if any As per P-FT-001, all purchase shall be conducted base on International cocoa trading rules, which enable us to bring dispute of adulteration waste, if any, to international arbitration court. <p>Note: There is a specification on waste for dried cocoa bean contract – which is a measurable index for adulterated waste, if any.</p>

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Step in supply chain	Identify potential threat	General Control Measures applied to prevent this threat	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
	Emerging concerns/news/alert: No vulnerability identified	-	-	-		No	-
	Storage and distribution of supplier facility: Cocoa exporter has bigger storage facility. They may process different crop also. Hence, it is possible to have unintentional adulteration with other crop during storage, as the collector may mix up with other crop they process	GCBCM control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	2	4	YES	<ul style="list-style-type: none"> Conduct Incoming Testing as per WI-QA-001.- Sampling 30% of all cocoa bean lot. Test adulterated waste vs contractual "waste" specification <i>Bean tester will conduct smell screening to detect any off notes, including adulteration of other crop (which could be spices)</i> <i>During bean dumping into production line, Production operators will screen the cocoa bean dumped into the grid line. And will report if there is adulteration</i>
Delivery to GCBCM	Historical Incidents No historical incident	-	-	-	-	No	-

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Step in supply chain	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
	Emerging concerns/news/alert: No vulnerability identified	-	-	-	-	No	-
	Storage and distribution of supplier facility Possible storage of containers at trans-shipment port. Theft, smuggling can happen	Cocoa bean are transport in sealed containers – using bullet seal. Or bulk vessel – chartered by GCBCM, and the hatch is sealed. All incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming. We do not rely on declared weight by supplier. Final weighthment at GCBCM warehouse.	3	2	6	No	-
(Receipt of cocoa bean by	Historical Incidents No historical incident	-	-	-	-	No	-

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Step in supply chain	Identify potential threat	General Control Measures applied to prevent this threat	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
GCBCM Warehouse Dept	Emerging concerns/news/alert News on syndicated theft , involving employee steeling cocoa bean at other cocoa factory	GCBCM practices – check- and – balance approach with 2 control measures below: <ul style="list-style-type: none"> • Warehouse vs security Receiving warehouse – are counter checked by security officer from HR& administration department. All cargo in/out and documents are verified by security team. • Production vs Finance Finance Dept – financial control section calculates and report yield (inverse of waste/cocoa bean grind) to top management. This yield figures are cross checked with production department figures. Any suspicious drop in yield i.e. increase of unexplainable waste – will trigger company scale investigation. 	3	2	6	No	-
	Storage and distribution of supplier facility GCBCM bean warehouse storage area is huge. Theft, smuggling can happen	GCBCM warehouse are fenced with minimum exit point. All exit points are guarded by security. CCTV is installed for security purpose.	3	2	6	No	-


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Step in supply chain	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
Processed cocoa into cocoa products from dried cocoa bean.	Historical Incidents No historical incident	-	-	-	-	No	-
	Emerging concerns/news/alert: Insider attack may cause intentional contamination of our cocoa products during processing.	Background checks is conducted on all employees. CCTV is installed at the point of every process. Annual training is conducted food defence and security awareness.	3	2	6	No	-
	Emerging concerns/news/alert: Food Safety complaint/issue may occur from our cocoa products produced from our cocoa processes.	Implementation of integrated food safety and quality management system; verification by rigorous and up-to-date food safety audits.	3	2	6	No	-

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Step in supply chain	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
	Storage and distribution : Container compromised in term of physical integrity may be used to deliver our cocoa products to customer	Warehouse Assistant shall inspect container before loading, as per P-WH-003, clause 4.0 Inspection of container shall also include verification of the physical integrity of the container structure and reliability of the locking mechanisms of the doors via eight-point inspection process, i.e. <ul style="list-style-type: none"> • Front wall • Left side • Right side • Floor • Ceiling/Roof • Inside/outside doors • Outside/Undercarriage • Fan housing on refrigerated containers Only container that passes the eight-point inspection shall be loaded with cargo and recorded in stuffing checklist. If found container that does not passes the seven-point inspection, warehouse executive and shipping executive shall be informed to replace the container.	3	2	6	No	-

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Step in supply chain	Identify potential threat	General Control Measures applied to prevent this threat	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
	<p>Storage and distribution :</p> <p>Unsecured container seal may be used in delivery of our cocoa products to customer. (tampered-evident seal may not be used)</p>	<p>Shipping executive shall give instruction for loading to Warehouse Executive by issuing Stuffing Checklist as per P-SH-001, clause 7</p> <p>High security seal must be affixed to all loaded containers bound for the United States, such as the one in the following diagram:</p>  <p>Shipping Executive are the designated persons to control container seals and distribute container seals to warehouse personnel to seal the containers onsite.</p> <p>Upon receiving the seals, an inventory must be conducted and the seals must be recorded in a seal log. The seal log must be updated with the seal usage information when issuing the seals. Container number, container seal number, production code, quantity, the name of warehouse personnel who load the cargo and double check the seal shall be clearly written on stuffing checklist</p> <p>Container number, container seal number, production code, quantity, the name of warehouse personnel who load the cargo and double check the seal shall be clearly written on stuffing checklist.</p>	3	2	6	No	-

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Step in supply chain	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
		<p>If found compromised seal and/or container during double check before signing on stuffing checklist, warehouse personnel shall inform warehouse executive and shipping executive immediately to take appropriate action, including informing Port Authority and US Customs and Border Protection, if necessary.</p> <p>If found broken seals in-transit, the seal change must be recorded. The driver must immediately notify the dispatcher that the seal was broken, indicate who broke the seal and provide the new seal number. The driver must take immediate action to notify the shipper, broker, and the importer of the seal change and the replacement of seal number.</p>					

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4.2 THREAT ANALYSIS – PREMISES

Non Product Threat - possible target of an attack	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
PREMISES	Container Storage Possible threat from unauthorised person access into container storage area	Security personnel shall ensure all containers to be parked and stored at designated container loading area inside the fenced factory/warehouse area. Security personnel shall guard at gate houses and prevent unauthorized access and/or manipulation. Authorized entry shall be recorded in Visitor Log Book. If found unauthorized entry into containers or container storages areas, security personnel shall take immediate action to neutralize it and report to HR executive and Factory Manager to take appropriate action.	3	2	6	No	-
	Physical Access Control Possible threat from unauthorised person access into our facilities	Access door control with computerised access card system for all employees, visitors and vendors shall be maintained by HR executive to prevent unauthorized entry to facilities, maintain control of employees and visitors, and protect company assets. Security personnel shall guard at all points of entry to prevent unauthorized access including positive identification of all employees, visitors, and vendors at points of entry.	3	2	6	No	-

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Non Product Threat - possible target of an attack	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
PREMISES	Physical Access Control Possible threat from unauthorised person, pretending as our employee and access into our facilities	<p>Designated access card with photo identification is given to every employee to give access right to factory and areas needed for the performance of his/her duty.</p> <p>Security personnel can check positive identification of employee against his access card with the photo identification.</p> <p>Issuance and removal of access card (i.e. identification badges) shall be controlled and recorded by HR executive Access card shall be issued :</p> <ul style="list-style-type: none"> • Upon employment of employee by HR executive • after remove reported lost card from the system, i.e. re-issue card to employee that has lost their card, by HR executive (Employee who lose their access card shall be penalised) • after positive identification of visitors and vendor that are entering GCBCM at guard house by security personnel <p>Access card shall be removed from system upon</p> <ul style="list-style-type: none"> • termination of employee by HR executive • immediately after report of lost card • after positive identification of visitors and vendor that are leaving GCBCM at guardhouse by security personnel 	3	2	6	No	-

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Non Product Threat - possible target of an attack	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
PREMISES	Physical Access Control Possible threat from unauthorised person, pretending as our guest and access into our facilities	Security personnel shall check photo identification, i.e. passport or National Residence Identification card (I/C) of visitors and vendor upon arrival at guardhouse. Security personnel shall <ul style="list-style-type: none"> • record details of entry of visitors at visitor log book, • issue visitor access card to visitor and ensure that visitors are wearing and displaying the visitor access card. Ensure the visitors are escorted by GCBCM employee	3	2	6	No	-
PREMISES	Physical Access Control Possible threat from unauthorised mail/packages that pose a threat to the receiver.	HR executive who receive packages and mail should screen the packages and mail before open. This screening exercise shall be done at least once per month	3	2	6	No	-
PREMISES	Physical Access Control Possible threat from unauthorised person, access into our facilities, due to poor implementation of access control by our security team	HR executive shall conduct mock / challenge entry of unauthorised persons into GCBCM premises at least once a year, to verify ability of prevent unauthorised access by security personnel	3	2	6	No	-

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Non Product Threat - possible target of an attack	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
PREMISES	<p>Personnel Security: Pre-Employment Verification</p> <p>High risk candidate may be recruited, and create damages to the company</p>	<p>HR executive shall perform verification check before employment on pre-employment personnel, i.e. successful interviewee of vacant position. This shall include:</p> <ul style="list-style-type: none"> • Employment history (prior 2 employers) • Background checks e.g. criminal records and bankruptcy. 	3	2	6	No	-
PREMISES	<p>Personnel Security: Personnel Termination Procedures</p> <p>Terminated employee may access into our facility after termination, and create damages to the company</p>	<p>HR executive shall ensure that removal of identification access cards, (IT) access rights, email address, pay roll entitlement, returns of company belongings are done before terminated employee leave the company.</p> <p>Documented this in Personnel termination checklist.</p>	3	2	6	No	-
PREMISES	<p>Security Training and Threat Awareness</p> <p>Possible compromise of security requirement due to lack of awareness training</p>	<p>In order to create awareness of security requirements among all employee, HR executive shall conduct “security training and threat awareness” for all existing employee, and upon employment for new employee.</p> <p>The security training and threat awareness shall include:</p> <ul style="list-style-type: none"> • Emphasizes awareness for important of cargo integrity • If discover or suspect any internal conspiracies, employee can always report to (1) direct superior and (2) letter direct addressed to General Manager • Emphasizes awareness of important to 	3	2	6	No	-

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Non Product Threat - possible target of an attack	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
		<p>protect access controls to GCBCM</p> <ul style="list-style-type: none"> • Physical Security: Container must be stuffed and stored inside GCBCM premises, within physical barriers and fencing. • Physical Security: security personnel shall safeguard at guardhouse to prevent unauthorized access to container and warehouses. • Fencing: GCBCM premises shall be enclosed with fencing • Fencing: Process/facility owners e.g. warehouse personnel and (patrolling) security personnel shall inspect integrity and damage of fencing during daily work, report to Maintenance Executive to initiate repair work according to P-MT-002 • Gates and Gate Houses: Gate and Guardhouses shall be guarded by security personnel. • Gates and Gate Houses: Gate and Guardhouses shall be designed to the minimum for proper access and safety • Parking: security personnel shall prohibit parking of private passenger vehicles at container stuffing area. • Building Structure: Building shall be designed with material that resist unlawful entry, and the process/facility 					

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Non Product Threat - possible target of an attack	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
		<p>owners, e.g. warehouse or production shall inspect integrity and damage of building structure during daily work, report to Maintenance Executive to initiate repair work according to P-MT-002</p> <ul style="list-style-type: none"> • Locking Devices and Key Controls: Access doors, windows, etc shall be locked whenever necessary. Issuance of keys and locks of each department shall be controlled by Managers or delegated executives. • Lighting: Maintenance shall provide and maintain adequate lighting at entrances/exits, container stuffing/storage area, fencing and car park. • Alarms Systems & Video Surveillance Cameras: Security personnel shall utilized CCTV and alarm, if applicable, to monitor premises and prevent unauthorized access to warehouses and container stuffing/storage area. 					
PREMISES	Possible compromise of security requirement due to poor implementation of food defence program	Awareness training and supervision of respective Head of Department on relevant control measures.	2	2	4	YES	<ul style="list-style-type: none"> • To conduct annual Security and Food Defense self-assessment • To conduct quarterly self-inspection <p>1) physical security systems and</p>

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Non Product Threat - possible target of an attack	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
							effectiveness of security program, 2) consealed people/packaging check at Toilet, Maintenance closet, lockers, storage area. 3) inventory check of facility key

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4.3 THREAT ANALYSIS – ORGANIZATION

Non Product Threat - possible target of an attack	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
Organization	Personnel Security: Background High risk candidate may be appointed as director, and create damages to the company	For director level, annual background checks and re-investigation e.g. criminal records and bankruptcy shall be conducted.	3	2	6	No	-

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4.4 THREAT ANALYSIS – INFORMATION SYSTEMS

Non Product Threat - possible target of an attack	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
Information systems	IT security: Password Protection Employee password may be compromised, resulted in unauthorised entry into our information systems	Company computer system shall be set to require change of password for all account holders, in every 6 months. IT policy and procedure, shall be established and training shall be given to relevance employee	3	2	6	No	-
Information systems	IT security: Accountability Possible compromise of IT security requirement due to poor implementation.	Periodic audit of abuse of IT shall be conducted at least once a year. This shall include <ul style="list-style-type: none"> • Check of improper access, tampering or the altering of business data: e.g. violator may use other person’s password altering business data – checked by access log on non-working days of employee. If found access records on non-working day: initiate investigation. 	3	2	6	No	-

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4.5 THREAT ANALYSIS – PREMISES (LABORATORY, UTILITIES, CHEMICAL STORAGE)

Non Product Threat - possible target of an attack	Identify potential threat	General Control Measures applied to prevent this threat	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD DEFENCE THREAT REDUCTION applied to prevent this SIGNIFICANT threat
LABORATORY	Possible threat from unauthorised person access into laboratory area	Designated access card with photo identification is given to every employee to give access right to factory and areas needed for the performance of his/her duty. Laboratory security inspection check – access control and controlled reagents	3	2	6	No	-
UTILITIES	Possible threat from unauthorised person access into utilities area.	Implement seals/lock to prevent unauthorised entry at utility <ul style="list-style-type: none"> Inventory check on facility key 	3	2	6	No	-
CHEMICAL STORAGE	Possible threat from unauthorised person access into chemical storage area.	Implement seals/lock to prevent unauthorised entry at storage <ul style="list-style-type: none"> Inventory check on facility key 	3	2	6	No	-