



Homeland Security

Protect Your Food Manufacturing Chemicals from Use in a Terrorist Attack

Food manufacturing facilities across the country produce and prepare a wide variety of foods for restaurants, grocery stores, and convenience stores every day. To properly prepare the food and keep it refrigerated, food manufacturing facilities use a variety of chemicals throughout the manufacturing and distribution process. When used properly, these chemicals help deliver nutritious food to our tables. In the wrong hands, terrorists can use some of these chemicals to do great harm.

What is CFATS?

The Chemical Facility Anti-Terrorism Standards (CFATS) program focuses precisely on filling this chemical security gap. Authorized by Congress in 2006, the CFATS program identifies and regulates facilities that possess specific high-risk chemicals at certain quantities and concentrations—known as chemicals of interest (COI)—to ensure they have security measures in place that reduce the risks associated with the COI.

Appendix A of the CFATS regulation lists more than 300 COI and their respective screening threshold quantity (STQ), concentration, and security issues for which they are regulated. Any facility in possession of a COI listed in Appendix A that meets or exceeds the STQ must report those chemicals to the Department of Homeland Security (DHS) through an online survey called a Top-Screen. Examples of the types of regulated food manufacturing facilities include—but are not limited to—dairy product manufacturing, meat packing, grain mills, sugar manufacturing, canning plants, bakeries, frozen food manufacturing, and cold storage facilities.

COI Commonly Found in CFATS-Regulated Food Manufacturing Facilities

Food manufacturing facilities use a wide variety of chemicals, some of which are listed in Appendix A. If released, stolen or diverted, and/or used as a contaminant, these chemicals have the potential to create significant human life and/or health consequences. Some of the commonly reported COI among food manufacturing facilities include, but are not limited to:

- Ammonia (anhydrous)
- Ammonia (conc. 20% or greater)
- Chlorine
- Hydrogen chloride (anhydrous)
- Hydrogen peroxide (conc. of at least 35%)
- Methane
- Nitric acid
- Peracetic acid
- Phosphine
- Phosphorus oxychloride
- Potassium permanganate
- Propane
- Propylene oxide
- Sodium nitrate
- Sulfur dioxide (anhydrous)

Food manufacturing facilities may possess many different chemicals depending on processes at the facility, so it is important to become familiar with all 300+ COI listed in Appendix A, along with the chemicals' STQs, concentrations, and security issues for which they are regulated. **If your facility is in possession of COI at or above the STQ listed in Appendix A, your facility must submit a Top-Screen within 60 days of coming into possession of the COI. See 6 CFR § 27.210(a)(1)(i).** Information on Appendix A may be found by visiting www.dhs.gov/appendix-a-chemicals-interest-list.



Collage of foods (clockwise from top left): fish, variety of cheeses, variety of produce, and frozen food in freezers.

CFATS Exclusions

Facilities regulated as a Public Water System under the Safe Drinking Water Act, Treatment Works under the Federal Water Pollution Control Act, and/or by the United States Coast Guard under the Maritime Transportation Security Act (MTSA) are excluded from the CFATS program. Facilities subject to regulation by the Nuclear Regulatory Commission (NRC) or by a State that has entered into an agreement with the NRC are also excluded. In addition, any facilities owned or operated by the Department of Defense or Energy are excluded. Please see 6 USC § 621(4) for more information.

What's Next?

If your facility is not exempt from filing a Top-Screen based on one of the categories listed above, and it possesses any COI at or above the STQ and concentration listed in Appendix A, your next steps include:

- Complete the Chemical-terrorism Vulnerability Information (CVI) training at <https://cvi.dhs.gov/training>.
- Register for a Chemical Security Assessment Tool (CSAT) account, at <https://csat-registration.dhs.gov/>.
- Fill out a Top-Screen, an online survey facilities use to report their chemical holdings to DHS.
- Based on the information provided, DHS assesses the overall risk of the facility.
- Facilities assessed as “high-risk” are required to submit a Security Vulnerability Assessment and security plan tailored to the security risks associated with their chemicals.
- More than 150 DHS Chemical Security Inspectors are located nationwide to assist high-risk facilities identify and implement security measures, and conduct inspections to ensure compliance with the CFATS regulation.

Failure of a Chemical Facility to Submit a Top-Screen

DHS has the authority to issue an order assessing a civil monetary penalty to a facility that is in possession of reportable COI and fails to submit a Top-Screen or is found to be in violation of any aspect of the CFATS program. See 6 USC § 624. Please visit www.dhs.gov/cfats-penalty-policy.

Tools and Resources for Food Manufacturing Facilities

DHS is committed to providing CFATS resources and tools to facilities with COI.

- Get the Appendix A Chemicals of Interest (COI) list: www.dhs.gov/publication/cfats-coi-list.
- Learn more about the CFATS process: www.dhs.gov/cfats-process.
- Review the CFATS Penalty Policy: www.dhs.gov/cfats-penalty-policy.
- Request a CFATS presentation to learn about any part of the CFATS regulation from submitting a Top-Screen to editing a security plan: www.dhs.gov/request-cfats-presentation.
- Request a Compliance Assistance Visit to learn what to expect from a CFATS Authorization or Compliance Inspection: www.dhs.gov/cfats-request-compliance-assistance-visit.
- The CFATS Knowledge Center is an online repository of frequently asked questions (FAQs), articles, and more: csat-help.dhs.gov/.
- The CSAT Help Desk provides timely support to chemical facility owners and operators. Call 1-866-323-2957 or email CSAT@hq.dhs.gov.

Contact Information

For questions, comments, or concerns, please contact CFATS@hq.dhs.gov or visit www.dhs.gov/cfats.