### FOOD DEFENCE

### Risk and Response



We help build better futures for business.



### Overview

- Food Defence what is it?
- Product Tampering
- Strategies to mitigate risk
- You suspect tampering –
   INK
- Response Steps
- Your food defence plan





1978 Netherlands Mercury Germany, Spain, England, Morocco



1982 Chicago Potassium cyanide









1984 USA Needles 17 States 2010 USA
Sand & Grit
50 episodes

2003
Supermarket Michigan
Insecticide
111 people













What you can see



What you CAN'T see



### Sabotage – changes in momentum



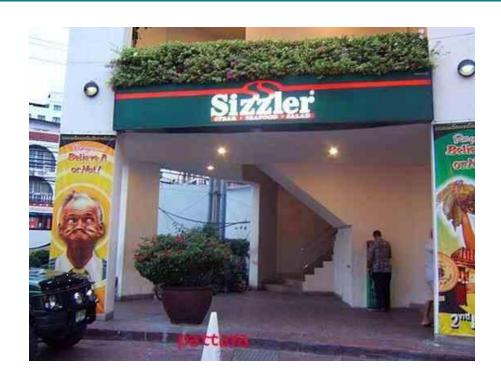


1989 UK
Heinz & Cow and Gate
Glass, razor blades,
pins, caustic soda
Suspected copy cats

2003 Italy
20 cities
Suspected copy
cats



### Sabotage – changes in momentum



2006 Australia Rat Poison Queensland



### Sabotage

**Discussion** 

What are your observations from the above examples?



### What is FOOD DEFENCE?



# IN DEFENCE OF FOOD

**Food defence** is the protection of **food** products from *intentional* contamination or adulteration by biological, chemical, physical, or radiological agents *introduced for the purpose of causing harm*.

It addresses additional concerns including physical, personnel and operational security.



### Relationship: Food Safety and Food Defence



#### **Food Safety**

Minimising unintentional contamination

#### **Food Fraud**

Deception, using food, for economic gain

#### **Food Defence**

Minimising intentional contamination

#### **Food Security**

Access to adequate supplies of safe food



# Relationship: What makes someone pick you or your produce?



You Your produce **Your industry** 

Random victim

#### **MOTIVE**

Money

Elimination

Jealousy

Revenge

**Political** 





**MOTIVE** Ego

**Tampering** Boredom

Sadism



 Political, religious terrorism

Driven by change of culture, politics!

In search of media impact





Employees

Driven by wishes of revenge (ie dismissal)





- Sub-contractors
- franchise owners?
- Co packers?

Driven by revenge, repression



Competitors

Search of destabilization





- Radom individual
- Foolish act

No rational motive, not in direct search of consequence on the consumer, but looking for a collateral effect





#### **MAIN THREAT CATEGORIES**

70% of cases observed
 Employees or temporary employees, sub-contractors, infiltrated activists

Less common – drivers and suppliers, organised groups





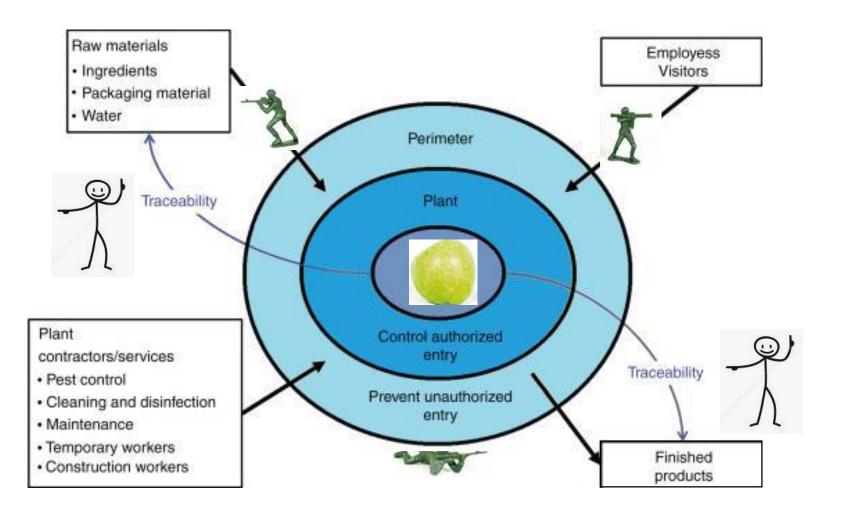
### What happens when it is outside your control?





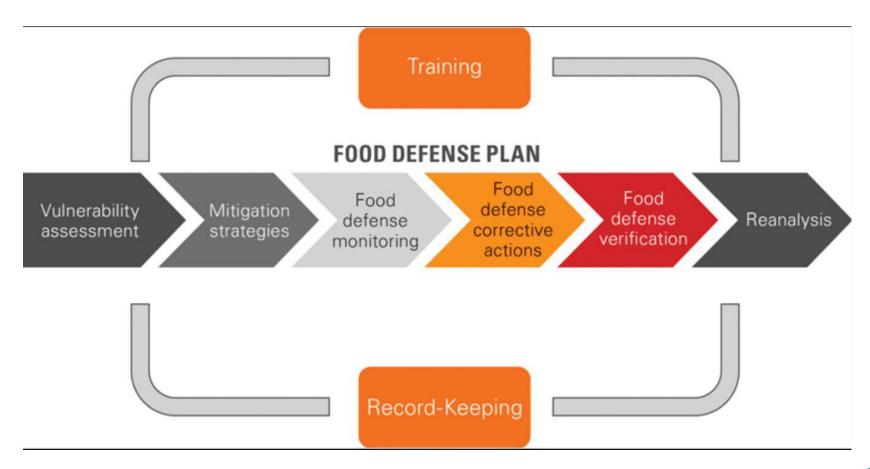


## FOOD DEFENCE – Your sphere of focus



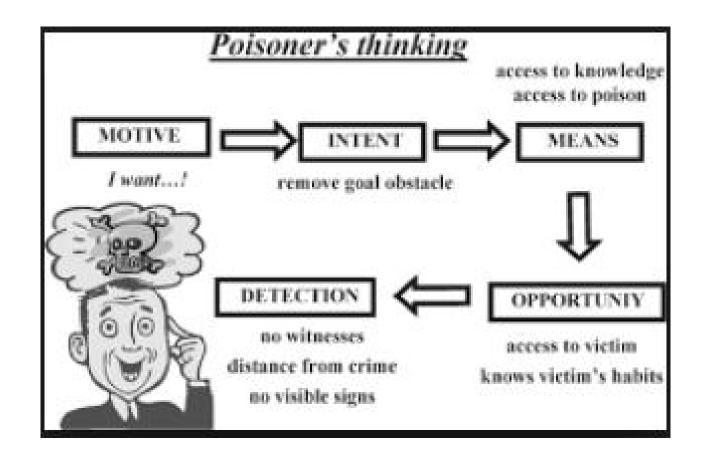


### Strategies to mitigate risk





### WORKSHOP - Think like a Bad Guy





### THINK LIKE THE BAD GUY.....Why?



https://www.youtube.com/watch?v=5iSb1H3MbDU



### THINK LIKE THE BAD GUY.....Why?



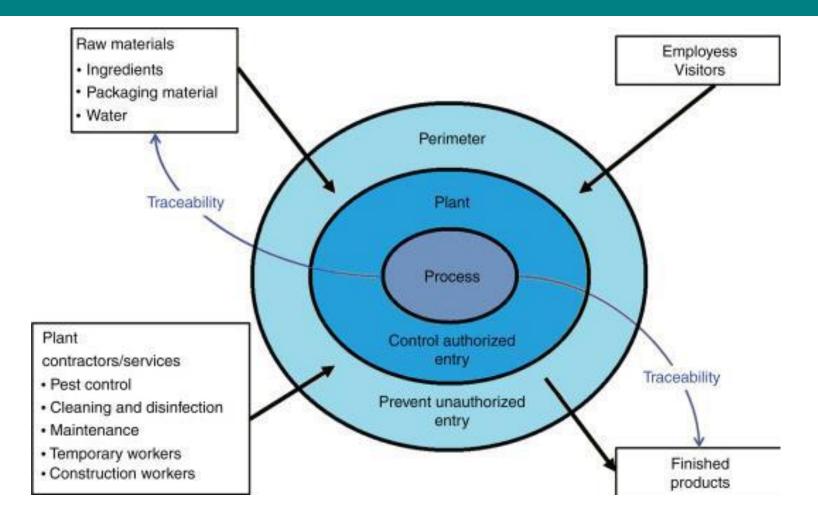
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### A.L.E.R.T – Risk Management

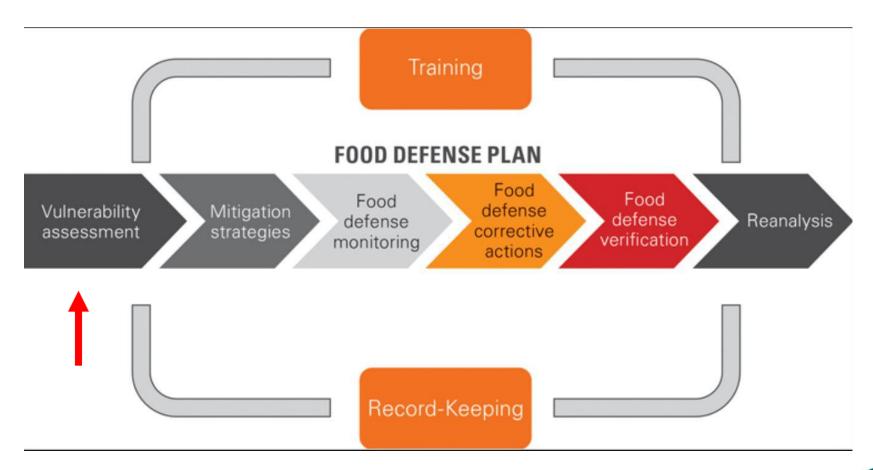
- A How do you <u>Assure</u> supplies and ingredients are safe and secure?
- L-How do you **Look** after the security of the products and ingredients in your facility?
- **E** What do you know about your **Employees** and people coming in and out of your facility?
- R-Could you **Report** on the security of your products while they are under your control?
- T-What do you do and who do you notify if you have a **Threat** or an issue at your facility?

## FOOD DEFENCE – Your sphere of focus





### Strategies to mitigate risk





## Vulnerability Assessment: 9 Questions to consider

- Is your outside perimeter secure?
- 2. Is access within your operation limited?
- 3. Are your processes secure?
- 4. Is your shipping and receiving secure?

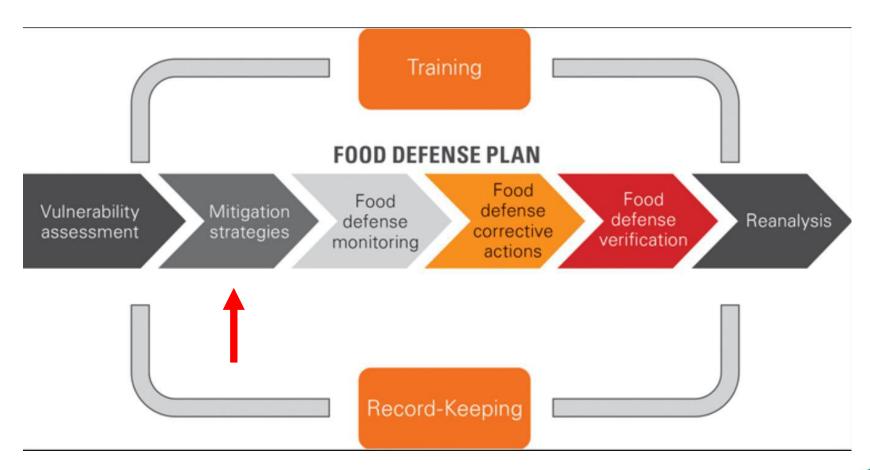


## Vulnerability Assessment: 9 Questions

- 5. Do you have an inventory system for stored materials?
- 6. Is access to your water supply limited?
- 7. Is mail opened away from sensitive areas?
- 8. Do you have screening and training procedures for your workforce?
- 9. Is access to sensitive areas limited?



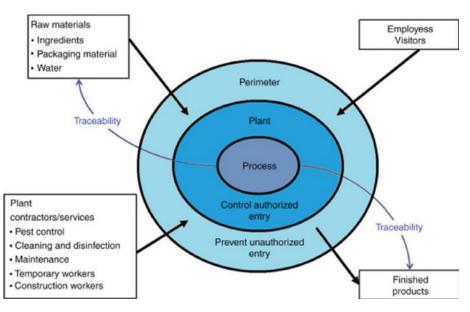
### Strategies to mitigate risk





### Strategies to Reduce Risk

- Vulnerability Areas
  - People
  - Property & Access
  - Approved Suppliers and Raw Materials
  - Plant and Equipment
  - Finished Products





### YOUR PEOPLE

Key line of defence "Eyes and Ears"



### **PEOPLE**

#### **Employees**

- Identification
- Background Checks
- Restrictions
- Training

#### **Non Employees**

- Log book
- Identification
- Supervision
- Restrictions





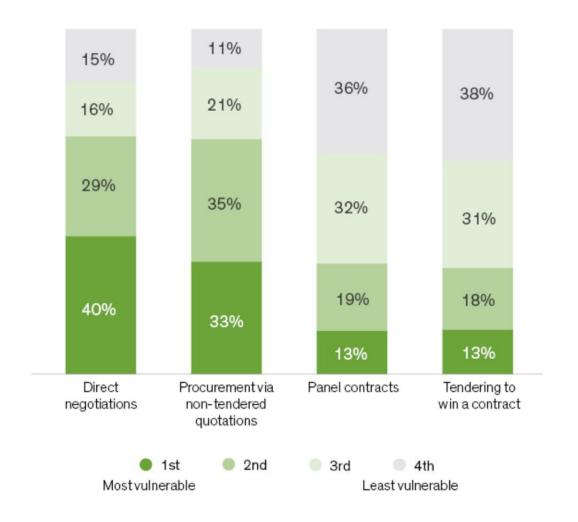
#### PEOPLE F.I.R.S.T

- F Follow your company's food defence plan and procedures
- Inspect your work area and surrounding areas
- R Recognize anything out of the ordinary
- **S Secure** all ingredients, supplies and finished product
- **T Tell** management if you notice anything unusual or suspicious



#### **APPROVED SUPPLIERS – Raw Materials**

Figure 12: Perceptions of the easiest procurement methods to corrupt





#### **APPROVED SUPPLIERS – Raw Materials**

- Vulnerabilities in the procurement process
- Transparency know your supplier

#### F11 Supplier table (example)

Business name: Great Australian Produce

Suppliers of materials and services that may introduce a food safety risk are identified. These may include:

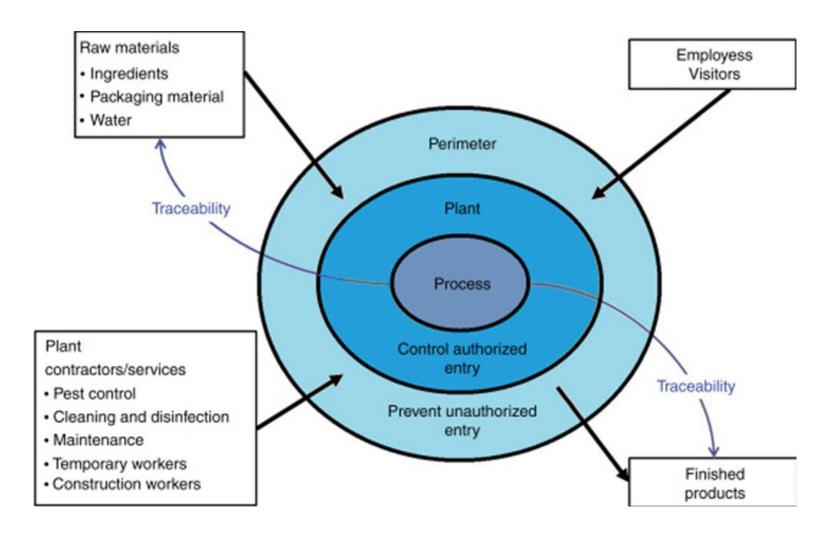
- Agricultural chemicals supplier, application
- · Agronomist/technical advisor
- · Bins, tubs, crates, packaging
- Calibration scales, thermometers, cool rooms
- Chemicals cleaning, water treatment
- Contract cleaning food contact equipment, premises
- Contract labour

- Fertilisers and soil additives
- · Laboratory testing
- Pest control
- Planting materials
- Portable toilets
- Produce
- Transport
- Water

Input material/service that may introduce a food safety risk	Name of supplier	Evidence of compliance/ mode of approval	Date approved	Completed by	If no longer sourcing from supplier	
					Date removed	Reason for removal
Chemicals	AG Chem Services	Agsafe accredited	12/2/16	A Grower		
Fertiliser	Fert suppliers	Certified to AS4454 for all product supplied	12/2/16	A Grower		
Fertiliser spreading	Fertspread	Written declaration	14/2/15	A Grower		
Packaging	ABC Cartons	Certification	20/2/16	A Grower		
Equipment calibration	Northern Scales	Certification	20/2/16	A Grower		
Portable toilets	Dunny Hire	Written declaration	20/2/16	A Grower		
Transport	Transfruít	Written declaration	23/2/15	A Grower	23/2/15	Poor service, incorrect storage temps
Transport	Fruit-trans	Certification	24/2/15	A Grower		



#### PROPERTY AND ACCESS









### CHEMICAL / HAZARDOUS GOODS





Storage Inventory



Waste



## CHEMICALS / HAZARDOUS GOODS

#### F4 Chemical authorisation record (example)

	Business name:	Great Au	stralian	Produce
--	----------------	----------	----------	---------

#### When an authorised person is not present, this chemical storage area is to be kept locked.

<u>Alex Grower</u> is responsible for the security, storage, handling, application and disposal of chemicals used on this property, and the training and supervision of workers who store, handle, apply and dispose of chemicals.

The following workers are authorised:

Authorised person	Authorised for (Y or N)		Supervisor's signature	Date
	Storage	Y		
Alay Crayuar	Handling	Y	010	8th March 2016
Alex Grower	Application	Y	II Grower	8" MWW 2016
	Disposal	Υ		
	Storage	Y		
Fred Care	Handling	Y	018	8th March 2016
frew cure	Application	Υ	II Grower	
	Disposal	Y		
	Storage	Y		8th March 2016
Dee Good	Handling	Y	- A Grower	
Dee Goott	Application	Y	Degrower	8" MWW 2016
	Disposal	Y		
	Storage			
	Handling			
	Application			
	Disposal			



## CHEMICALS / HAZARDOUS GOODS

#### F4 Chemical inventory (example)

Business name: Great Australian Produce

				Label	Quantity	Permit no. and	Disposal of chemical/container		
Date received	Place of purchase	Product name	Batch no. (where available)	expiry date/ DOM*	(including container size)	permit expiry date (if applicable)	Date	Method	Name of person responsible
Unknown	Rural Buying Service	Weedmaster Duo	177421-0533	MD 11/13	5 L		12/4/16	3x <b>rinse</b> Drummuster	Fred Care
11/12/15	Norco	Vertímec	5566792	MD 03/15	1 4	Per 14618 2020			
11/12/15	Norco	Lepidex	S~ 3345231	MD 04/14	10 L				
29/1/16	Norco	Bulldock 25 EC	26754M	MD 10/15	5 4				
14/2/16	Norco	Success Neo	8765~99985		5 L				
28/2/16	Rural Buying Service	Weedmaster Duo	214878-0533	MD 10/15	5 L				

<sup>\*</sup>DOM = Date of Manufacture

Stored chemicals are checked at least annually to identify and segregate chemicals for disposal that have:

exceeded the label expiry date

exceeded the permit expiry date

had their registration withdrawn

· containers that are leaking, corroded or have illegible labels

Checked by: Fred Care Date checked: 12/4/16



## WATER STORAGE AREAS / TANKS

#### F6 Water source record (example)

Business name: Great Australian Produce

Water source	Preharvest (including block, crop and mode of water use)	Postharvest (including crop and mode of water use)	Completed by	Date completed
Bottom Dam	Carrot and Zucchíní Veg blocks; overhead irrigation	Carrot · pre washing (only if required).	Alex Grower	21/2/16
Top Dam	Avocados, all blocks, drip irrigation		Alex Grower	21/2/16
Bore 1	Spray application, all crops		Alex Grower	21/2/16
Town water	~	All postharvest water used on Avocados and Zucchinis. Final wash water used on carrots.	Alex Grower	21/2/16



## WATER STORAGE AREAS / TANKS

#### F6 Water treatment monitoring record (example)

Business name: Great Australian Produce

Method of water treatment: Chlorination

What is monitored/checked to ensure treatment is effective (e.g. pH, freely available chlorine)? pH = 4.5 - 50; FAC = 50 - 60ppm

Frequency of monitoring: Twice a day

Date/time	Result	Is water treatment effective? (Yes/No)	If no, detail the action taken	Checked by
12/2/16 10am	ok-pínk	Yes		Alex Grower
12/2/16 2pm	0k-pínk	Yes		Fred Care
13/2/16 10am	0k-pínk	Yes		Alex Grower
13/2/16 2pm	0k-pink	Yes		Fred Care
14/2/16 10am	Fail - green	No-	Adjusted dosage of chlorine, retested water, re-washed produce.	Alex Grower
14/2/16 2pm	ok-pínk	Yes		Fred Care



## **FACILITIES**

## Report: Woman burns down farm, vehicles causing nearly \$200k worth of damage







## **FACILITIES**



CONTRACTORS / SERVICES



**PEST CONTROL** 



CLEANING & SANITATION



**MAINTENANCE** 



**CONSTRUCTION** 

DON'T FORGET STORAGE AREAS



## **Facilities Checklist**

#### F8 Facilities audit checklist (example)

Page 1 of 2

Business name: Great Australian Produce

Location/area: Packing shed

For produce packed for retail sale (this includes, but is not limited to, retail crates and pre-packs).

	Checked by: Alex Grower	Checked by:	Checked by:
Requirement	Date of check: 18/3/16	Date of check:	Date of check:
	Yes, No or N/A	Yes, No or N/A	Yes, No or N/A
Cleaning: Staff facilities; production area; product contact surfaces; equipment; storage areas.	Yes		
Comments/actions	As per cleaning plan		
Packing environment: Appropriately equipped and maintained; adequate lighting.	No - light out		
Comments/actions	Light replaced, staff made aware to report to manager		
Equipment: Clean; maintained.	Yes		
Comments/actions	As per cleaning plan		
Scales and cool rooms: Calibrated.	Yes		
Comments/actions	Calibration records sighted		
Packaging: Appropriate for use; clean and free of foreign objects; appropriate stored.	Yes		
Comments/actions	Shed protocol		



## VEHICLES / DELIVERIES





#### As a minimum:

**CHECK** 1 representative sample per receival / load

**RECORD** check



#### FINISHED PRODUCT

#### As a minimum:

**INSPECT** 

**RELEASE** 

**CHECK** 1 representative sample per dispatch / load

**RECORD** check

Effective: 1 November 2006 Fresh Specs

PRODUCE:	APPLE	FMA	PRODUCE SPECIFICATIONS			
ТҮРЕ	Red	VARIETY	Pink Lady			
CLASS	One	NOTES				
GENERAL APPEARANCE CR	ITERIA					
Colour		of fruit surface: nale green-cre	am ground colour; white flesh with greenish tinge.			
Visual Appearance	Skin smooth to slightly bumpy no torn flesh or skin. No foreig	y and stem intact. Stems may b in matter. Generic industry fruit inded stickers preferred.) Sticke	e missing provided that the break is clean and there is sticker showing PLU number or bar code and rs to cover a minimum of 85 % of fruit intended to be			
Sensory	Crisp, juicy flesh; no objection	able odours or tastes.				
Shape	Round to round-conical, flatte	ned at base/apex. No irregular	curvatures or distorted shapes.			
Size	Evenly sized fruit (as pre-orde	red per requirements). Apples s	supplied in 1.5 kg pre-packs to be 64 - 67 mm diamet			
Maturity	Harvested ripe, minimum pen	etrometer value (11mm plunger	r): 5.8 - 6.0 kg. Brix > 13.5° (Soluble Solids) at receival			
MAJOR DEFECTS						
Insects	With evidence of live insects.					
Diseases		th evaluation in we insects.  th fungal or bacterial rots of the skin or flesh (eg Anthracnose, blue mould, grey mould).  th sunken spots surrounded by red/ black halo (Apple scab).				
Physical/Pest Damage		vounds (that break the skin). Stem punctures should not exceed 3 pieces per carton, t have distinct edges and are indented or watersoaked lesions				
Physiological Disorder	With brown discolouration of With internal breakdown or br With Bitter pit / Lenticel injury With translucent core flesh (w	rowning (senescent fruit).	nternal cavities (brown heart)			
Temperature Injury	With skin discolouration (sunb With flesh browning, wrinkled	oum). I skin, watersoaked appearance	(freezing damage).			
MINOR DEFECTS						
Physical/Pest Damage	indented > 2 sq cm	eg flat/ sunken areas slightly da hail marks, limb rub), affecting	arker than skin colour with no distinct edges or in aggregate > 1 sq cm.			
Skin Marks/Blemishes	With stem end russet affectin With scattered cheek russet a					
Physiological Disorder	With dropped shoulders > 15°					
CONSIGNMENT CRITERIA						
Tolerance Per Consignment			per apple. Total minor defects (outside allowance cts must not exceed 2 % of consignment. Combined			
Packaging & Labelling	current legislative requiremen	nts. Labelling to identify grower s, class, size and/or minimum ne	w food grade materials or sanitised returnable crates. All labelling must meet the abelling to identify grower's name/brand (plus growers name/code if via a ss, size and/or minimum net weight. Produce to identify Country of Origin (eg. tainer.			
Shelf Life	Produce must provide not less	s than 14 days clear shelf life fro	om date of receival.			
Receival Conditions		an with air bag suspension, unl	ments (if required) for Interstate Consignment. Stacked onto a stabilised pallet ith air bag suspension, unless otherwise approved. Pulp Temperature 4 - 10° C.			
Chemical & Containment Residues	All chemicals used pre/postha	rvest must be registered and a em. Residues, Contaminants an	ks of its season) must be registered and approved for use in accordance with the requirements residues, Contaminants and Heavy Metals to comply to the FSANZ Food			
		abad and a HACCD based for	d under a HACCP based food safety program that is subject to an annual third- fication to be forwarded to receiver.			



## **SECURITY**

#### **PHYSICAL**

- Perimeters
- Lighting
- Access points
- Storage
- Keys

#### **INCOMING**

Paperwork

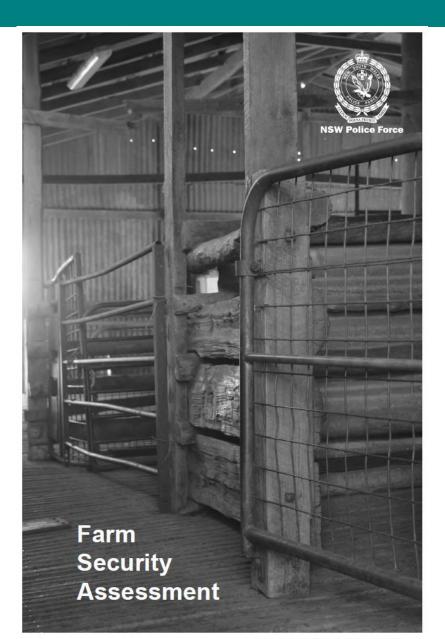
#### **INSIDE**

- Mail / IT
- Changes in inventory
- Emergency Response
- Storage (products / packaging)





## **SECURITY - RESOURCES**



#### **NSW Police Force Farm Security Assessment**

COPS Event No. (Police Use Only)			
Date	Time		
Name			
Address (Street)			
Suburb/Town	Postcode		
Telephone No			

No.	Question	Yes	No	N/A	Comment
RME	3 Number / Property Nan	ne			
1	is the RMB number and property name clearly visible from the road?				
2	Are these visible at night?				
Fenc	es and Gates				
3	Are boundary fences and gates in good condition?				
4	Are gates securely fitted and can they be locked?				
Warr	ning Signs				
5	Are there warning signs displayed on the boundary fences and gates on the property?				
Land	dscaping				
6	Are trees and bushes around the homestead trimmed to reduce conceaiment opportunities?				
Ligh	ting				
7	is there security lighting (eg: sensor lights) installed around the homestead and sheds?				
8	Do you have light timers inside the homestead or sheds?				



## High Tech Crime

# Petya cyber attack: Cadbury chocolate factory in Tasmania hit by ransomware

**ABC Radio Hobart** 

Updated 28 Jun 2017, 4:55pm





#### INFORMATION

STEALING PASSWORDS

- Sensitive
- Computer Systems –
   where is your data?
- Trend Analysis

# Safeguard your information

In the past six years, identity thieves have stolen more than \$107 billion\*. Here are some do's and don'ts to help protect your information.



**Create a complex password** with letters, numbers and symbols and don't reuse them on multiple accounts.



**Look for security-enabled web addresses** which begin with "https://" when banking and shopping online.



Think about what you post on social media as cybercriminals look for "too much information."



**Don't send any personal identifying information** in an email.



**Don't click on links or open attachments in emails** from people you don't know — delete them.



Don't use public Wi-Fi to conduct personal banking or financial transactions.

## High Tech Crime – Next Wave

#### **Australian Federal Police:**

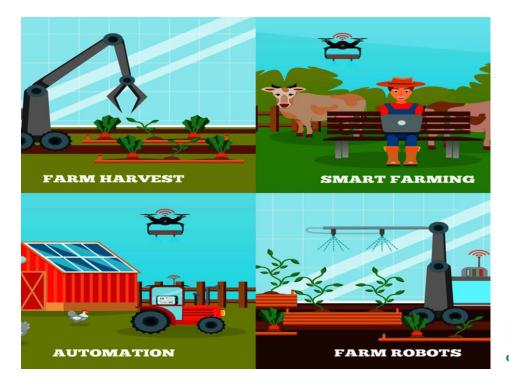
- Computer intrusions (i.e. malicious hacking)
- Unauthorised modification of data including destruction of data
- Disrupted denial of service (DDoS) attacks using botnets
- The creation and disruption of malicious software (i.e. visuses, worms, trojans)





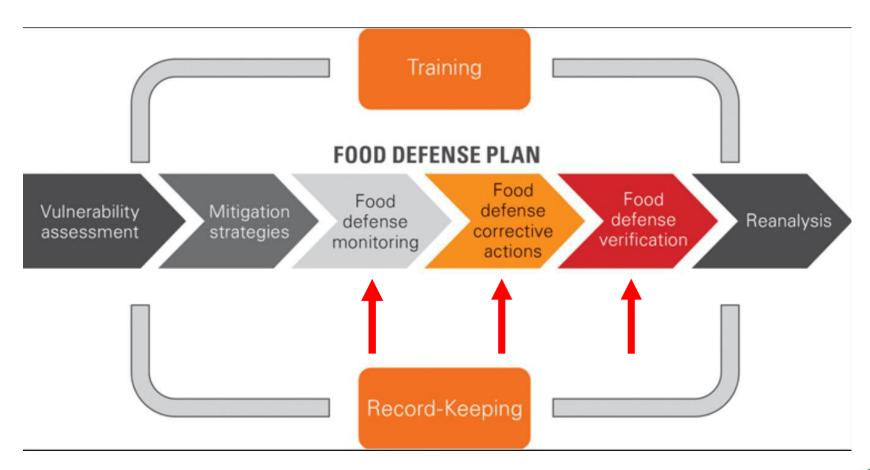
## Wireless and Mobile Technologies

- Mobile Devices
- Instant Messaging
- Wireless Networks
- Drones
- RFID





# Strategies to mitigate risk





### MONITORING & VERIFICATION



INSPECTIONS (I.E. FACILITIES, SECURITY SYSTEMS, LIGHTING)



**VISITOR CONTROL** 



**TRAINING** 



DOORS / ACCESS POINTS



APPROVED SUPPLIERS – RANDOM SAMPLE



CHEMICALS – RANDOM SAMPLE

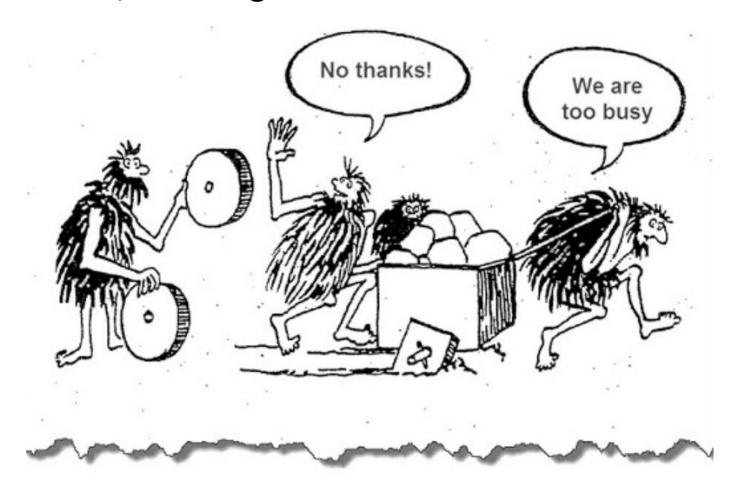


**TEST YOUR PLAN** 



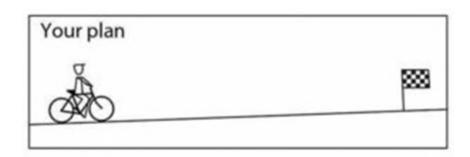
## MANAGEMENT REVIEW

#### Commitment, Planning and Resources

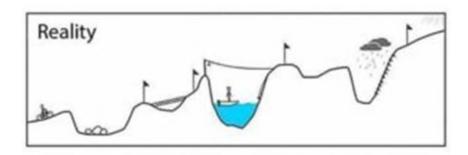




How do you find out?



What happens next?





# What happens?

#### WHO RECALLS FOOD IN AUSTRALIA?

FSANZ can't order or force a food recall. Only Australian states and territories have enforcement powers to mandate, order or force a recall if necessary.

#### **FOOD BUSINESSES**

Must notify their business customers and local food enforcement agency that a food recall is needed.

Must provide information to FSANZ about the recalled food.

Must notify the public of the recall



#### **ENFORCEMENT AGENCIES**

Confirm that a recall is needed and work with the food business to recall the food.

Check that the business is effectively recalling the food.



#### **FSANZ**

Coordinates the recall with the relevant jurisdiction and food business.

Informs government, industry and international government contacts of the recall and advises consumers via the FSANZ website and social media platforms.



If it's your product ... or product type!





Even if it is your product, you may not be in control of the initial message or its timing



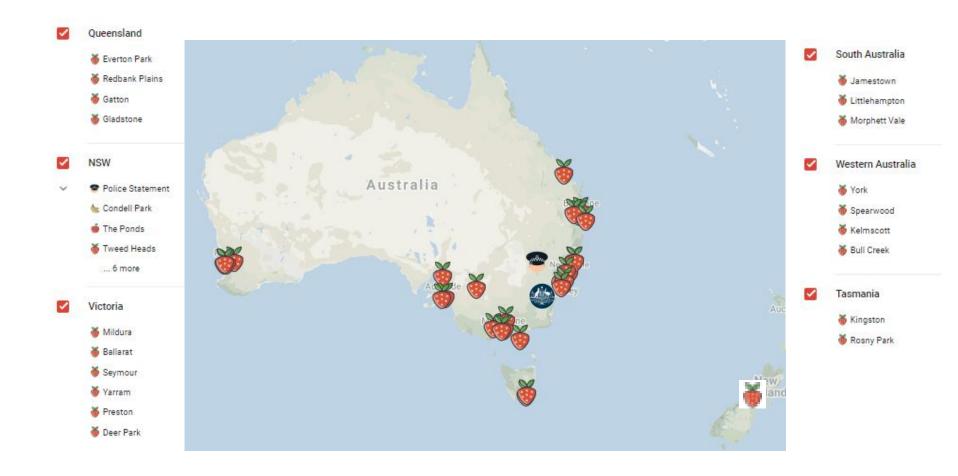
# Insights to consider if product tampering occurs







# Insights to consider if product tampering occurs





## If it's your product ... or product type!

All communication ... honest, transparent, relevant, timely, non-defensive, and delivered with humility.

When was the last time you did a dry run on your crisis communications ... did you consider every form?





If it's your product ... or product type

- Know the key product and issue elements
- Alert your colleagues FAST (don't forget front line)
- ONE media contact
  - They decide how/when/where and who responds
- Spokesperson CEO/QA ... <u>it is</u>
   <u>NOT sales!</u>







Collateral impacts - best solved with good relationships (customers, media advisors)





Meanwhile

. . .

perceptions of product





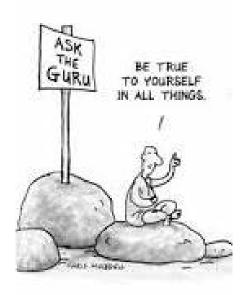
## Meanwhile ... in the background

#### Look through a customer and consumer lens ...

- ➤ Their perception is your reality
- ➤ Brand owner every piece of feedback required FULL investigation
- > Precautionary withdrawals

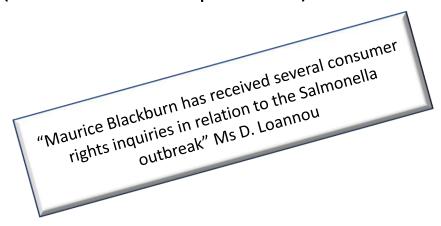
#### **Pressure test your vulnerabilities**

Walk your chain ... don't make assumptions

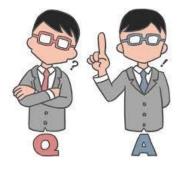




5<sup>th</sup> February 2016 54 cases Mixed salad *Salmonella anatum* (no deaths reported)



Did you involve your legal team in your crisis communications dry run?





## 11 February – 143 cases

Victorian Health Department said 143 people were believed to have fallen ill with salmonella after eating a range of pre-packaged lettuce products produced by Tripod Farmers.

You can't control pitch and pace of all messaging ... but always know and work to control your own!



LETTUCE grower Houston's Farm could begin shedding casual staff within a week if a sales slump sparked by an interstate salmonella scare is not turned around.

Houston's sales dropped 40 per cent last week after a Victorian producer's packaged lettuce products were found to contain the bacteria.



#### Meanwhile ...

#### **Check your sales and marketing strategies**

- Range rationalisation
- If your SKU is part of the collateral damage, don't ignore it
- Consider product launch timing

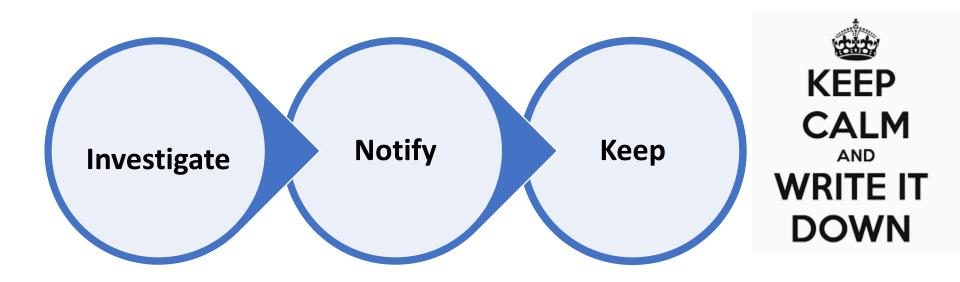
# Consumer relationships – what do you need to do to regain trust?

- Feedback get out and seek it
- Know pitch and pace of consumer
- Be part of the consumer journey for information





### Remember INK





### Remember INK





Question individual who called

- Which product
- What date
- Where did you purchase it
- When did you identify problem?
- Can you get the product AND packaging back?



### Remember INK





Investigate the "what"

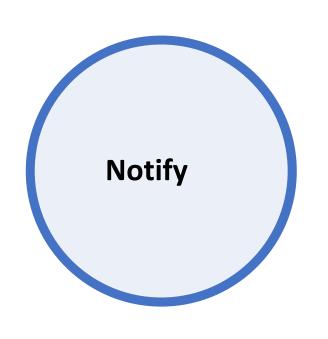
- Follow your procedure
- Check your samples

(if you don't have any, go and buy one!)



### Remember INK





#### **ALWAYS INVESTIGATE FIRST**

Be ethical, transparent, and honest – remember who this could impact!

Follow your crisis management plan

Who do you call and when?

## Remember INK





You will be asked questions:

- Identify origin (produce, packaging, packing)
- Were there any issues that occurred on the day?
- Inspect equipment of any clues
- Know your team
- Did you have visitors or contractors on site?



### Remember INK





Resolve if this is an acute or chromic occurrence

**Product recall** 

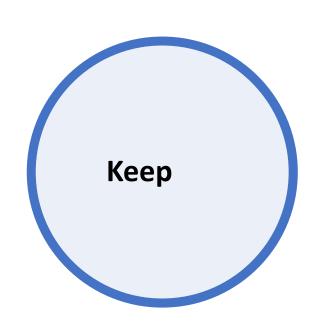
Third party investigation (police, regulator, customer)

**Your Corrective Action** 



### Remember INK





Complete final reports

Share information with appropriate parties

Retain samples of product in question under proper storage conditions

Be available



Rumination #12: The most dangerous part of a crisis is the aftermath because everyone wants to forget it and move on.





#### Crisis & Recovery communications

CEO	Team member with sales or customer experience	Team member Social media	Team member Traditional media
Coordinates all communication	Manages hotline with technical team	Monitor on-line media trends related to the crisis	Advertising alerts
Regular stakeholder review meetings with CEO (understands who your leadership team is talking with)	Works closely with marketing on key messages	Consumers will look to your Facebook and Web for communications	Public service announcements
Crafts key messages and distributes – sets the parameters also for how you will respond to social media	Captures all enquiries and contact points on database (including intent to repurchase)	Reputation monitoring (FB, Twitter, Youtube) – work with Sales to understand how these trends can impact on strategy	Stories of YOUR journey – be sensitive to what social media is telling you.
Handles media and influencer coms	Analyses and reports on inquiry trends	Monitor customer feeds for trends	Involve key influencers including politicians
Don't forget to tell YOUR story	Captures data related to refunds or other offers		



## Your Food Defence Plan



# IN DEFENCE OF FOOD



## Your Food Defence Plan

#### F12 Food defence vulnerability assessment and control plan (example)

Business name: Great Australian Produce

Input/end product	Food defence threat	Control plan
Water	Open (public/unauthorised persons) access to production areas and water source. Potential for deliberate contamination of water source, resulting in contamination of crop.	Access to production areas/growing sites/water sources is restricted to authorised persons.
Ground water	Contamination of ground water as a result of fracking activity (coal seam gas) in region.	Review of coal seam gas fracking activity and input areas. Consideration of alternative water sources if required.

Completed by: A Grower Date completed: 1/3/16



## Your Food Defence Plan

#### WORKSHOP – Build / Review your Plan

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Completed by: A Grower Date completed: 1/3/16



# What makes your Plan functional?

Meets all **FOUR** of the following:

**1: Developed** – documented and signed

2: Implemented – practices are followed

3: Tested - monitored and validated

4: Reviewed and Maintained







Thank you for your participation



We help build better futures for business.