

Food Fraud Compliance Requirements: as of January 1, 2018

ReposiTrak and USP: Food Fraud Vulnerability Assessment and Mitigation Planning

January 24, 2018 – 1 to 2pm ET

John Spink, PhD

Director & Assistant Professor, Food Fraud Initiative
College of Veterinary Medicine/ Food Safety

WWW.FoodFraud.MSU.edu Twitter @FoodFraud and #FoodFraud



MSU Food Fraud Think Tank

Brand Owner and Manufacturer

- Support the FFI mission to standardized prevention practices
- Help lead strategy and policy.
- Internal and external leadership.
- Deliverables:
 - Expanded engagement such as CODEX, ISO, etc.
 - Food Fraud Audit Guide MOOC
 - Expanded on-line, on-demand resource such as YouTube
 - Food Fraud Initiative Reports
 - Industry benchmarking surveys



Food Fraud Curriculum

FREE

Massive Open Online Course (MOOC – free, open, online)

- Free, open, online, open to everyone, includes a 'certificate of completion'
- **Food Fraud Overview MOOC** – May & November
- **Food Fraud Audit Guide MOOC** – Oct, Dec, Jan, etc.
- **Food Defense Audit Guide MOOC** – Open to Public January 20, Feb, etc.

Executive Education (Short-Course)

- Food Fraud Strategy, Quantifying Food Risk with Vulnerability Assessments

Graduate Courses (Online, Three Credits)

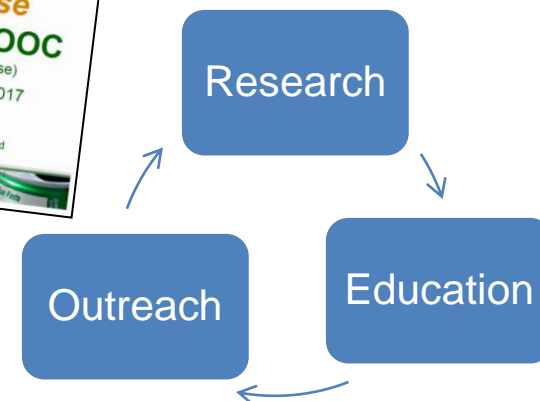
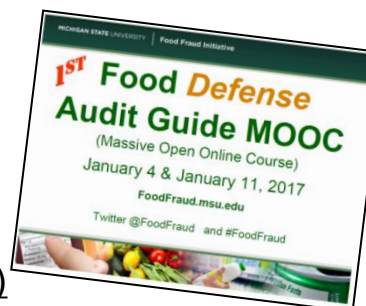
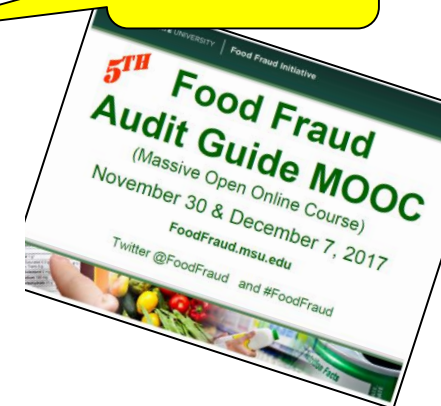
- Anti-Counterfeit & Product Protection (Food Fraud)
- Quantifying Food Risk (including Food Fraud)
- Global Food Safety (including Food Fraud)
- Food Protection and Defense (Packaging Module)
- Packaging for Food Safety

Graduate Certificate (Online, Four Courses Each)

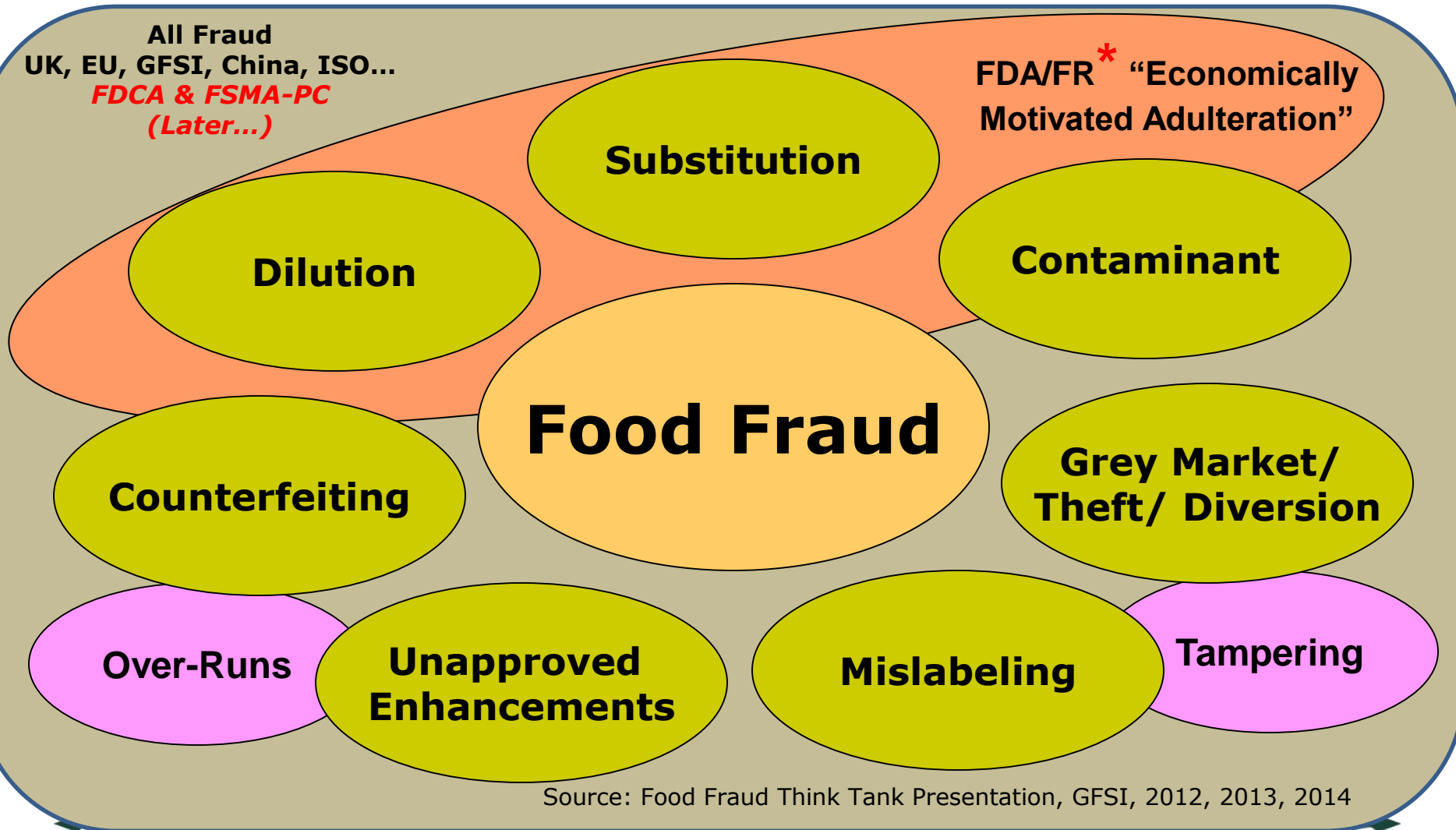
- Certificate in Food Fraud Prevention (Food Safety)

Master of Science in Food Safety (Online)

- www.online.FoodSafety.msu.edu



What is Food Fraud?



The Food Risk Matrix

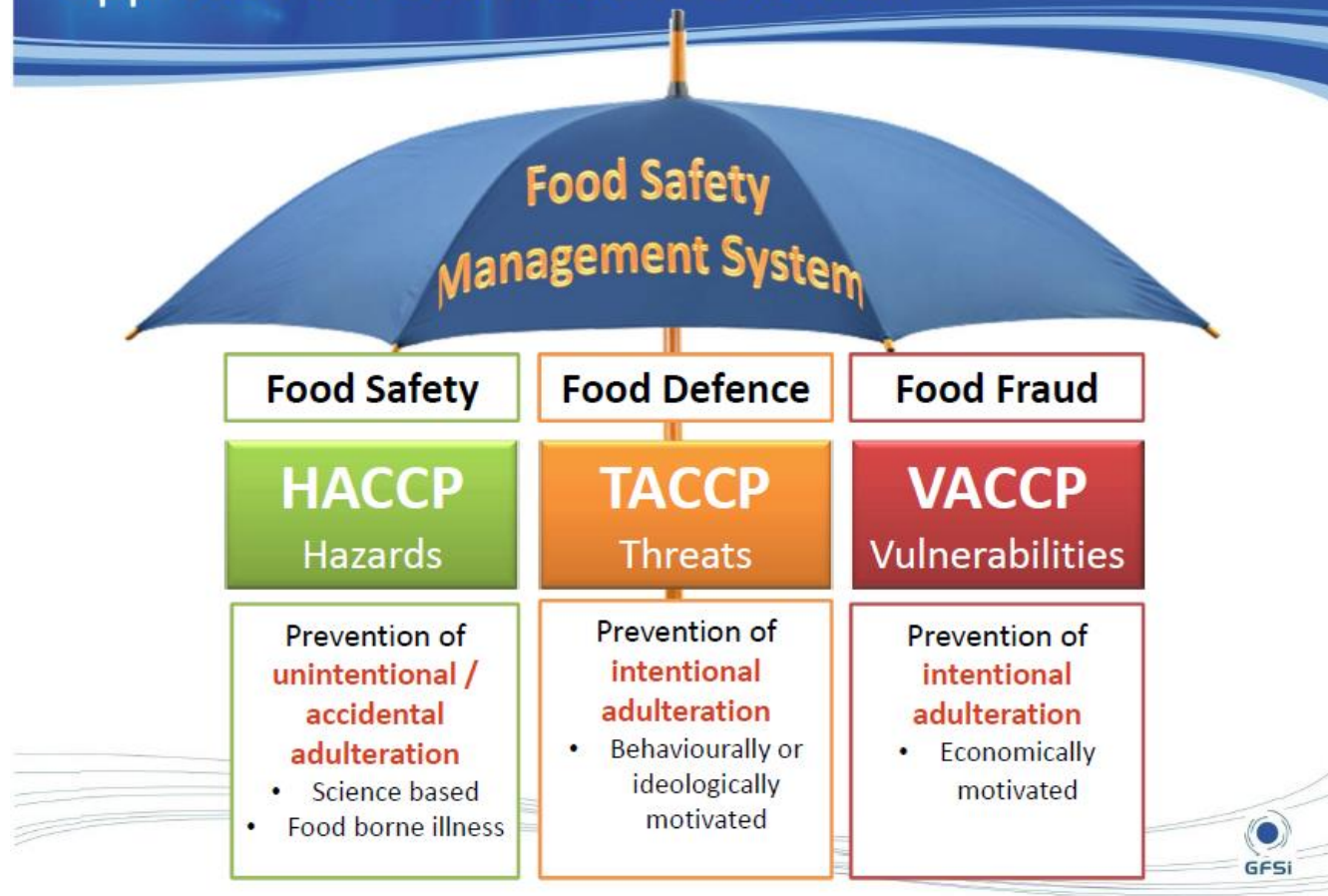
Prevent by Understanding the Motivation

Food Quality	Food Fraud	Motivation Gain: Economic
Food Safety	Food Defense Wide-scale Terrorism	Harm: Public Health, Economic, or Terror
Unintentional	Intentional	
Action		

Source: Adapted from: Spink (2006), The Counterfeit Food and Beverage Threat, Association of Food and Drug Officials (AFDO), Annual Meeting 2006; Spink, J. & Moyer, DC (2011) Defining the Public Health Threat of Food Fraud, Journal of Food Science, November 2011

GFSI Conference 3/2014

Approach to Food Fraud Prevention



REVIEW: GFSI Issue 7 Published Food Fraud Terms

FFVA

FSM AI 21 Food fraud vulnerability assessment

- The standard shall require that the organisation has a **documented food fraud vulnerability assessment procedure** in place to identify potential vulnerability and prioritise food fraud mitigation measures.

FFPS

FSM AI 22.1 Food fraud mitigation plan

- The standard shall require that the organisation has a **documented plan** in place that specifies the measures the organisation has **implemented to mitigate** the public health risks from the **identified food fraud vulnerabilities**.

+Details

FSM AI 22.2 Food fraud mitigation plan

- The standard shall require that the organization's Food fraud mitigation plan **shall cover the relevant GFSI scope** and shall be supported by the organisation's Food Safety Management System.

Every 'vulnerability' does **NOT** need a control plan – e.g. meteor.

Required Documents

- Food Fraud Vulnerability Assessment
 - Clarify details: at least annual, etc.
- Food Fraud Prevention Strategy
 - Clarify details: covers all fraud and all products, etc.



FFVA:
Rank



FFPS:
Method

Food Fraud Compliance Requirements: Scope

“Food Fraud Compliance Requirements — The general compliance requirements for Food Fraud prevention are:

1. Conduct a Food Fraud Vulnerability Assessment (Y/N)
2. Written (Y/N)
3. Implement a Food Fraud Prevention Strategy (Y/N)
4. Written (Y/N)
5. Minimally conduct an annual Food Fraud Incident Review (Y/N)
6. Note: Address all types of Food Fraud (Y/N)
7. Note: Address all products from both incoming goods (e.g., ingredients) and outgoing goods (e.g., finished goods) through to the consumer.” (Y/N)

• Reference:

- Food Safety Magazine, Feb 2017, “*Food Fraud Vulnerability Assessment and Prefilter for FSMA, GFSI and SOX Requirements*”, <http://www.foodsafetymagazine.com/magazine-archive1/februarymarch-2017/food-fraud-vulnerability-assessment-and-prefilter-for-fsma-gfsi-and-sox-requirements/>
- New Food Magazine, Feb 2017: *Food Fraud Prevention – how to start and how much is enough?*, <http://www.newfoodmagazine.com/33890/new-food-magazine/past-issues/issue-1-2017/issue-1-2017-digital-version/>



“Just a Check Box” – yes and no

- There is often a criticism that some audits are just a checkbox – did it, check. Is this ok for Food Fraud? For this stage right now?
- YES – OK! Optimal!
- The formal and official process has started...



Q: YES OR NO?

Takeaways: Focus on...

- Preventing all Food Fraud
 - not only adulterant-substances
- All compliance
 - not just FSMA-PC, FSMA, FDCA, or Securities Laws
- Reducing recall potential
 - do your job... your CFO and Board of Directors care
- Reducing liability
 - Corporate, legal, regulatory, and overall

MSU Engagement 2018

	Outcome	Benefit	Commitment
Graduate Course	Share your knowledge and set direction of research	Plus <i>Graduate Certificate in Food Fraud Prevention</i>	14 Weeks, online, May to August, ~\$2200
Executive Education	Share your knowledge and set direction of research	Develop the internal talent to support initiatives in the AC space, meet other thought leaders (“invitation only” sessions for brand owners)	2 Days on-campus (\$1950) Feb 20-23, 2018 (22-23 FFIS) Fall 2018, TBD
Multi-Client Studies	Research the why’s of AC/D, understand underlying drivers	Uncovering the drivers may lead to new strategies to combat Counterfeiting	Teleconference Meetings with option for on-campus e.g. Veterinary and Animal Product Fraud
MOOC	Engage global network of Food Fraud thinkers..	Two, 2-hour on-line webinar format with assessment. Students earn an MSU “credential”.	Overview: May & Nov. FF Audit Guide: Monthly Food Defense Audit Guide: Jan, Mar, +

Acknowledgements

- **MSU Veterinary Medicine:** Dean Christopher Brown, Chair Dan Grooms, Chair Ray Geor, Dr. Wilson Rumbeiha, Cindy Wilson, Dean John Baker
- **MSU Global:** Associate Provost/ Executive Director Christine Geith, Jerry Rhead, Gwyn Shelle, Lauren Zavala, Associate Provost/ EVP Dr. Karen Klomparens, Rashad Muhammad
- **Queens's University Belfast (UK):** Professor & Director Christopher Elliott, Dr. Moira Dean, Dr. Michael Hollis
- **MSU Online Master's of Science in Food Safety:** Director Melinda Wilkins, Ex-Director Julie Funk, Kristi Denbrock, Heather Ricks, Peggy Trommater, Heidi Chen, Dr. Gary Ades, Chair Ray Goer
- **MSU Food Science:** Chair Fred Derksen, Les Bourquin, Bradley Marks, Felicia Wu, VP of Research Ian Gray, David Ortega, Gale Strasburg
- **MSU Program in Public Health:** Director Michael Rip and Douglas C Moyer
- **MSU NFSTC:** Dr. Scott Winterstein, Trent Wakenight,, Dr. Kevin Walker, Sandy Enness, Jen Sysak, Dr. Rick Foster, to name a few critical contributors and supporters.
- **MSU Food Safety Policy Center:** Dr. Ewen Todd
- **MSU School of Packaging:** Dr. Bruce Harte, Dr. Robb Clarke, Dr. Laura Bix, Dr. Paul Singh, Dr. Diana Twede, Dr. Gary Burgess, Dr. Harold Hughes, Dr. Mark Uebersax, Dennis Young, and Director Joseph Hotchkiss
- **MSU Communication Arts/ Consumer Behavior:** Dr. Maria Lapinski and Dr. Nora Rifon
- **MSU Criminal Justice:** Dr. Jeremy Wilson, Director Ed McGarrell, Dr. Justin Heinonen, Roy Fenoff, Zoltan Fejas, Barbara Sayre, and Sara Heeg
- **MSU Supply Chain Management:** Dr. Cheryl Speier, Dr. Ken Boyer, Dr. John MacDonald, Chair David Closs, Dr. Stan Griffis, Dr. Judy Whipple
- **MSU College Social Science:** Dean Marietta Baba and Assoc Dean Chris Maxwell
- **MSU College of Law:** Dr. Neil Fortin and Dr. Peter Yu
- **MSU Libraries:** Anita Ezzo, Nancy Lucas, Kara Gust
- **MSU International Programs:** Dr. Mary Anne Walker, Dr. John Whimms
- **State of Michigan's Ag & Food Protection Strategy Steering Committee:** Dr. John Tilden, Brad Deacon, Gerald Wojtala, Byron Beerbower
- **The Citadel:** Dr. Roy Fenoff

Discussion

John Spink, PhD

SpinkJ@msu.edu

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www.FoodFraud.msu.edu

Video on YouTube: Search “Food Fraud” and “MSU”