



# Food Fraud prevention & Food Defense

Aldin Hilbrands, Technical Director

# Introduction

- Food Fraud prevention & Food Defense
- Draft FSSC 22000 Scheme requirements
- FF Pilot project
- Discussion topics

# Context



# GFSI Key elements

## *Food defense*

The organization shall have a documented and annually reviewed food defense threat assessment procedure in place to identify potential threats and prioritise preventive measures

## *Food Fraud prevention*

The organization shall have a documented and annually reviewed food fraud vulnerability assessment procedure in place to identify potential vulnerabilities and prioritise food fraud mitigation measures

# Draft V4 – FD & FF Prevention

- Documented procedure
- Threat/vulnerability assessment and mitigation measures
- Annual review as a minimum

## Documented procedure

The organization shall document, establish and maintain a procedure for FD/FF threat/vulnerability assessment that:

- Identifies potential threats/vulnerabilities
- Develops mitigation measures and
- Prioritises them against the threats/vulnerabilities

# Vulnerability/threat assessment tools

## *Food Defense Threat Assessment*

- ISO 28000 Security management system standard
- PAS 96 Defending Food and Drink guideline

## *Food Fraud Vulnerability Assessment*

- SSAFE Food Fraud Vulnerability Assessment tool available at [www.ssafe-food.org](http://www.ssafe-food.org)

# Mitigation measures

- The organization shall put in place appropriate mitigation measures to protect consumer health.
- These processes shall:
  - Be controlled within the scope of the food safety management system
  - Be in compliance with applicable legislation.



# Annual review as a minimum

The food fraud procedure shall be reviewed:

- After each actual or potential failure of a mitigation measure, and
- At least annually

# Key objectives Pilot



- 1) Understand impact and efforts required as a result of the new food fraud prevention requirements
- 2) Pilot the new food fraud prevention requirements and collect input for a harmonized audit approach
- 3) Gain an understanding in the difficulties encountered and lessons learnt regarding using the FFVA-tool

# Pilot project participants



**-and-**

**Multiple Food manufacturing companies and  
FSSC 22000 accredited Certification Bodies**

**Other parties involved  
Wageningen University**

# Preliminary conclusions pilot project

## Generic

- Need for multidisciplinary teams; QA teams take the lead with involvement from e.g. procurement, legal and HR.
- It requires time efforts ranging from 3 to 7 months to fully implement a fraud mitigation system
- By their nature, many questions answered in the PwC/SSAFE tool are based on subjective criteria
- Awareness on food fraud needs to be increased

# Preliminary conclusions pilot project

## **Companies and auditors feel sufficient knowledge is present**

- Though focus is primarily around historic food fraud cases and therefore focus on known risks
- Less knowledge about which risks of food fraud exist along the organisation's supply chain and which adequate controls should be implemented
- Limited expertise on institutionalizing the risk assessment and mitigation efforts in exists within (company) management systems

# Preliminary conclusions pilot project

## **Additional guidance for auditors is desired to harmonize audit approach**

- Parties perceive the new requirements as clear however not prescriptive and specific
- Auditors highlight additional guidance is desired e.g. minimum requirements for documentation and clarification around minimum audit expectations to demonstrate compliance
- Auditors expect additional time is likely to be required

# Preliminary conclusions pilot project

## **Limited control / mitigation measures identified and implemented for identified vulnerabilities**

- Vulnerability assessments are being conducted but lack systematic implementation
- Most controls have technical characteristics e.g. additional checks on raw materials and origin and are by nature reactive
- Most pilot companies are defining control plans (VACCP's), but have not implemented controls or assessed its effectiveness
- Most pilot companies lack formalized procedures to support implementation of vulnerability assessments and control plans

# Topics to further discuss

- Draft requirements
- Audit duration
- Auditor competence



# Keep in touch!

E-mail [info@fssc22000.com](mailto:info@fssc22000.com)

Website [www.fssc22000.com](http://www.fssc22000.com)

Phone +31 183 645 028

 Join us at LinkedIn: Group FSSC 22000

 Follow us on Twitter: @FSSC22000