



Food Fraud prevention & Food Defense

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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 food defense mitigation 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

- 1) Documented procedure
- 2) Threat/vulnerability assessment and mitigation measures
- 3) Annual review as a minimum

Documented procedure

The organization shall document, establish and maintain a procedure for FD and 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
- FDA Food Defense Plan builder

Food Fraud Vulnerability Assessment

- SSAFE Food Fraud Vulnerability Assessment tool available at 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 FD and FF procedures 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

2016 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

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