



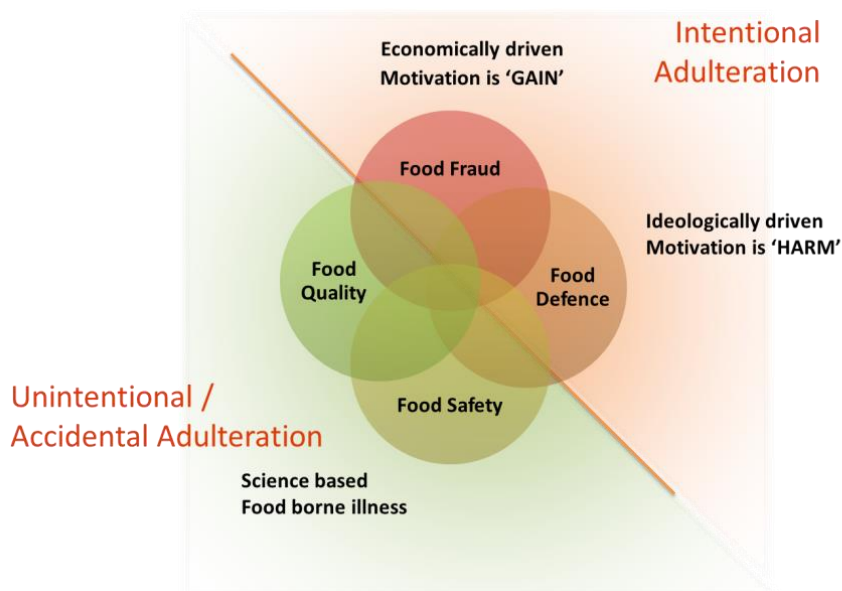
# **GFSI POSITION ON MITIGATING THE PUBLIC HEALTH RISK OF FOOD FRAUD**

July 2014

# GFSI POSITION ON MITIGATING THE PUBLIC HEALTH RISK OF FOOD FRAUD

## INTRODUCTION

Food fraud, including the subcategory of economically motivated adulteration, is of growing concern. It is deception of consumers using food products, ingredients and packaging for economic gain and includes substitution, unapproved enhancements, misbranding, counterfeiting, stolen goods or others. Unlike food defence, which protects against tampering with intent to harm, the consumers' health risk of food fraud often occurs through negligence or lack of knowledge on the fraudsters' part and can be more dangerous than traditional food safety risks because the contaminants are unconventional. High profile food fraud incidents with an impact on consumers' health include the oft-cited melamine crisis, in which adulterated milk powder led to infant hospitalizations and even fatalities; knowingly shipping Salmonella contaminated peanuts and mislabelled recycled cooking oil.



The GFSI Board recognises that the driver of a food fraud incident might be economic gain, but if a public health threat arises from the effects of an adulterated product, this will lead to a food safety incident. In the context of the GFSI's efforts to provide "safe food for consumers everywhere", the GFSI Board has been supporting a Food Fraud Think Tank<sup>1</sup> to investigate and recommend to the GFSI Board, how companies could strengthen their food safety management system to protect consumers from the potential harm caused by food fraud practices.

The work of the Food Fraud Think Tank emphasizes that mitigating food fraud, and the potential harm these incidents can bring to public health, requires a different perspective and skill-set than food safety or food defence, because socio-economic issues and food fraud history are not included in the traditional food safety or food defence risk assessments. Vulnerabilities relating to food fraud can also occur outside the traditional manufacturing, processing, or distribution systems of a company.

The Think Tank recommends that two fundamental steps are taken by the food industry to aid in the mitigation of food fraud: firstly, to carry out a **'food fraud vulnerability assessment'** in which information is collected at the appropriate points along the supply chain (including raw materials, ingredients, products, packaging) and evaluated to identify and prioritise significant vulnerabilities for food fraud.

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Secondly, **appropriate control measures shall be put in place to reduce the risks** from these vulnerabilities. These control measures can include a monitoring strategy, a testing strategy, origin verification, specification management, supplier audits and anti-counterfeit technologies. A clearly documented control plan outlines when, where and how to mitigate fraudulent activities.

## GFSI POSITION

The GFSI Board has decided to follow the recommendations of the Food Fraud Think Tank and proposes to incorporate the two food fraud mitigation steps in the form of two new key elements in the GFSI Guidance Document to;

1. Require a company to perform a food fraud vulnerability assessment
2. Have a control plan in place.

The vision is that, like the introduction of food defence into the Guidance document a few years ago, the mitigation of food fraud and the potential impact on consumers' health becomes an integral part of a company's food safety management system.

During a food safety certification audit, conducted against GFSI recognised schemes, the auditor will review the documentation related to the vulnerability assessment process and confirm that a comprehensive control plan, as outlined in the Appendix, has been developed and implemented by the company. The auditor is not expected to detect fraud or affirm that an anti-fraud program is capable of "preventing fraud". This approach is very much in line with the verification of a HACCP plan during the food safety audit. The GFSI Board will furthermore specify any additional auditor competence needed for the above activities.

The GFSI Board recognises the importance of food fraud mitigation and the urgency to start performing food fraud vulnerability assessments and implementing associated control plans. There are many initiatives across the industry related to this key topic and GFSI would like to continue to lead this field, provide direction and ensure alignment of the various initiatives. On the other hand, the GFSI Board also appreciates that companies and scheme owners need to prepare for this new challenge and need time to develop the required knowledge and skills.

The GFSI Board decided to issue this position paper to express its intent and defer the incorporation of the new food fraud mitigation key elements, along with any additional auditor competencies, until the next full revision of its Guidance Document (Version 7) to be released in 2016.

The GFSI Board will support SSAFE's<sup>2</sup> initiative which aims to develop and publish practical guidelines for companies on 'how' to assess and control food fraud vulnerabilities within their organizations and supply chains. SSAFE is working to have these guidelines available before the release of Version 7 of the Guidance Document, so that companies and scheme owners can prepare their organisations before the new requirements are effective.

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## APPENDIX: PROPOSED KEY ELEMENTS FOR FOOD FRAUD MITIGATION

The below key elements were prepared by the Guidance Document Technical Working Group based on the recommendations of the Food Fraud Think Tank. Consultation will continue during the development of Version 7 of the Guidance Document.

<b>'Food fraud vulnerability assessment' requirements</b>	The standard shall require that the organisation have a documented food fraud vulnerability assessment in place to identify potential vulnerability and prioritise food fraud vulnerability control measures.
<b>'Food fraud vulnerability control plan' requirements</b>	<p>The standard shall require that the organisation have a documented plan in place that specifies the control measures the organisation has implemented to minimize the public health risks from the identified food fraud vulnerabilities.</p> <p>This plan shall cover the relevant GFSI scope and shall be supported by the organisation's Food Safety Management System.</p>

## REFERENCES

<sup>1</sup> The Food Fraud Think Tank was convened to further advance the food fraud topic; it brought together experts in analytical testing, certification, supply chain security and criminology as well as manufacturing and retailing companies.

<sup>2</sup> SSAFE (Safe Supply of Affordable Food Everywhere) is a non-profit organisation addressing pre-competitive issues for the food industry through public private partnerships.