



OnTrak with ReposiTrak

Thought Leadership Webinar Series

Quarterly Trends Update: 2020-Q1

Food Fraud Compliance and the Implications to Your Business

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Creating an Industry Standard Platform



“ReposiTrak augments our food and drug safety efforts...with a **proven, comprehensive and easy-to-implement solution** that **doesn’t require systems changes** and is extremely cost effective.”

– Hilary Thesmar, PhD, RD, CFS FMI VP for Food Safety Programs



“We see the ReposiTrak system becoming an **industry standard** for the retail supply chain, helping all trading partners **meet the new federal food safety requirements**, reducing unsalable products and keeping the end consumer healthy.”

--Francis Cameron, President & CEO of ROFDA



“We were looking for a technology partner to help us **raise the bar** not only with our data management and reporting, but also with upgrades to all of our user interfaces. It made perfect sense to partner with ReposiTrak because of their **experience in the industry** and technical capabilities.”

--Robert Garfield, Senior Vice President, SQFI



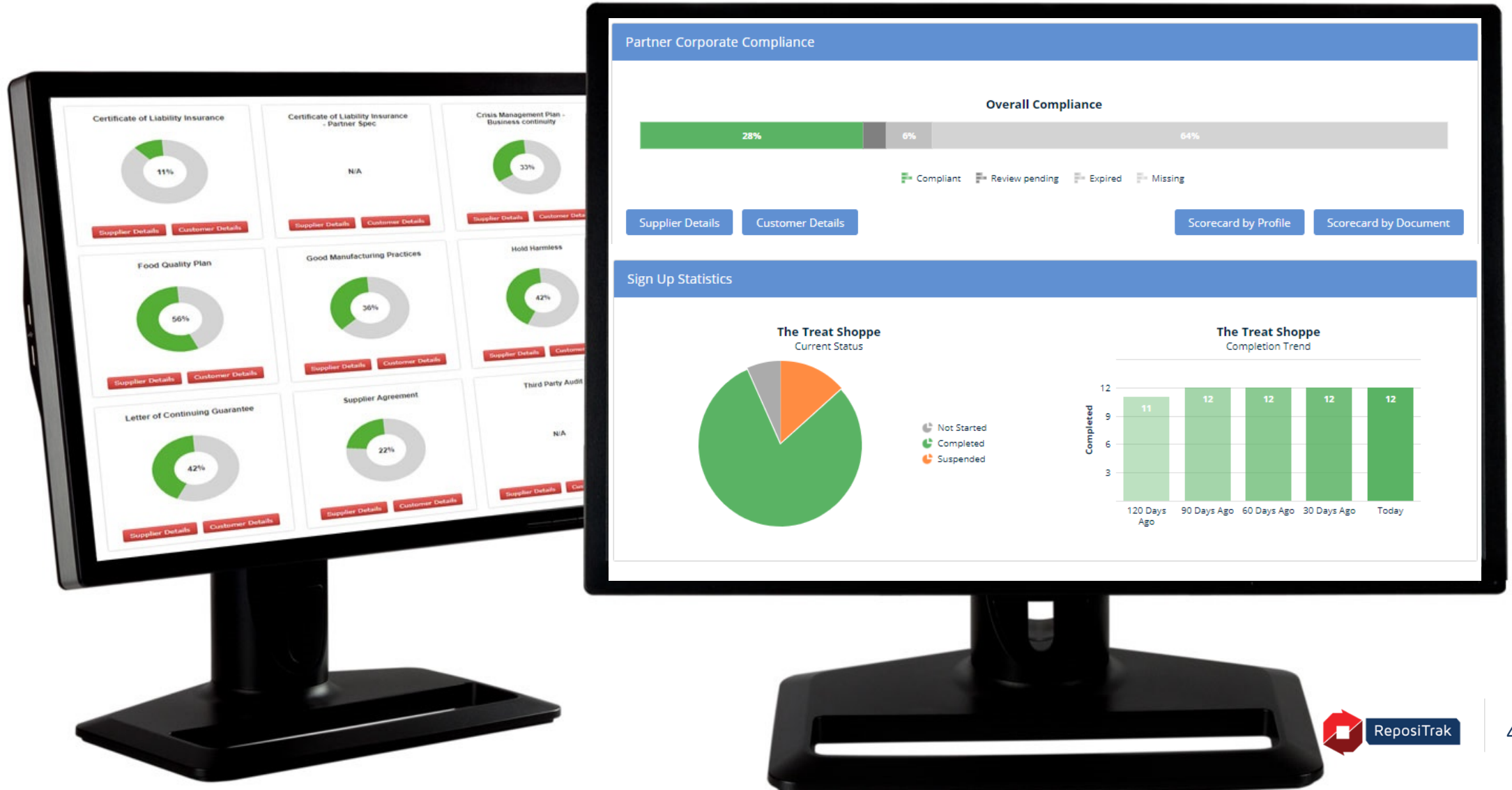
“ReposiTrak is a **pioneering innovator** in delivering robust retail management software solutions for our rapidly changing industry. This technology will equip our members with a toolbox for success in a constantly evolving marketplace. We are thrilled to partner with ReposiTrak as we continue to advance and expand our ecosystem.”

--Patrick Spear, president and CEO of GMDC



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Categories: Any All
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SUPPLIER	SUPPLYING	PROVIDING DOCUMENTS	COMPLIANCE
Acme Industries Massachusetts Hyde Park	Bagels Bakery Assortments Baking Chocolate Baking Flavors & Extracts Baking Mixes Baking Soda Batter & Coating Mixes	Letter of Continuing Guarantee Supplier Self-Assessment Questionnaire (SAQ)	 Action
Beta Candies & More Maryland Baltimore Frederick Virginia Roanoke West Virginia Martinsburg	Candy & Chocolate Cereal & Granola Bars Cheese Cheese Puffs Chips Coffee Crackers Dried Vegetables Dry Beans Eggs View 8 more	Carrier Compliance Policy Certificate of Liability Insurance Certificate of Organic Operation-by Facility Emergency 24-hour Contact Number (Esign) FDA Registration - By Facility Genetically Modified Organism (GMO) Statement Hold Harmless Letter of Continuing Guarantee Organic Certification - By Facility Product Recall Program Documentation View 10 more	 Action
Charlie Coffee Colorado Denver Sparta California Los Angeles Oakland San Francisco	Candy & Chocolate Cereal & Granola Bars Cheese Cheese Puffs Chips Coffee Crackers Dried Vegetables Dry Beans Eggs View 8 more	Carrier Compliance Policy Certificate of Liability Insurance Certificate of Organic Operation-by Facility Emergency 24-hour Contact Number (Esign) FDA Registration - By Facility Genetically Modified Organism (GMO) Statement Hold Harmless Letter of Continuing Guarantee Organic Certification - By Facility Product Recall Program Documentation View 2 more	 Action

Want to Make Your Sales Team Happy?

ReposiTrak helps you connect with new customers in the Marketplace so you can sell more!





OnTrak with ReposiTrak

Quarterly Trends Update: 2020-Q1

Food Fraud Compliance and the Implications to Your Business

John Spink, PhD

- **Director & Assistant Professor, Food Fraud Initiative**
- **Eli Broad Business College, Michigan State University**
- **Department of Supply Chain Management**

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Quarterly Trends Update: FF Implementation Method to “Demonstrate Implementation”: 2020-Q1

Webinar: Tuesday, January 14, 2020
4:00pm to 5:00 pm ET

John Spink, PhD

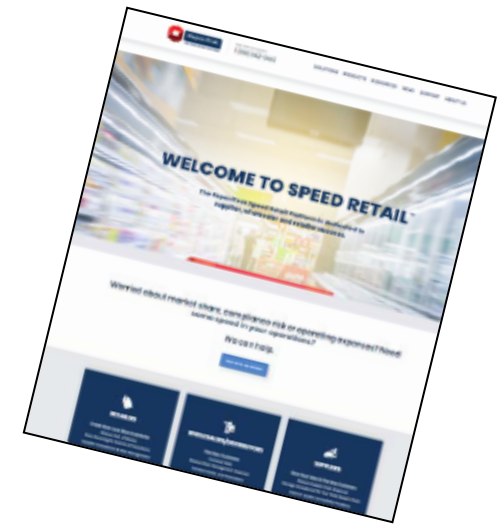
Director & Assistant Professor, Food Fraud Initiative

Eli Broad Business College, MSU

Department of Supply Chain Management

Introduction to Supply Chain Management (SCM 303)

Procurement and Supply Management (SCM 371)



WWW.FoodFraudPrevention.com

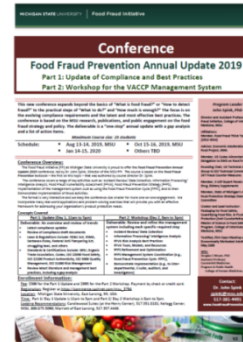
Twitter @FoodFraud #FoodFraud



Food Fraud Curriculum

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

- With a **'certificate of completion'** based on an **assessment**
 - On-demand, monthly instances, Ten Course Hours
1. Food Fraud Overview MOOC
 2. Food Fraud Audit Guide MOOC
 3. Food Defense Audit Guide MOOC
 4. Training: FF VACCP (Vulnerability Assessment & Food Fraud Prevention Strategy)



Conference (High-level update on key topics)

- **Food Fraud Prevention Annual Update 2019 & Workshop**
 – Oct 15-16 & Jan 14-15, 2020

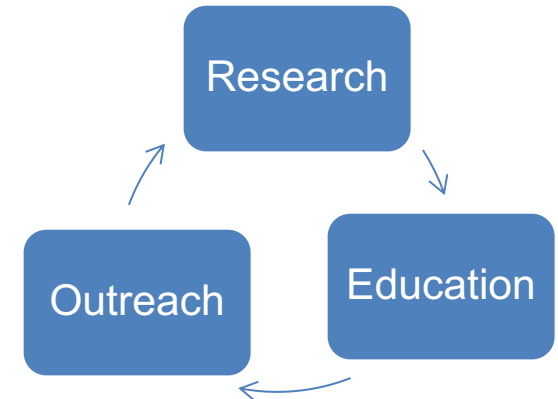
Executive Education (In-depth education)

- **Food Fraud Management Strategy & FFVA Workshop**
 — ~~Sept 10-11-12, 2019~~ & **Feb 4-5-6, 2020**



Textbook: Food Fraud Prevention

- Release November 3, 2019



Our Approach: The Science and Sciences of Food Fraud Prevention



Quarterly Trends Update Webinars Series

- 2018-3Q
- Non-conformity

- 2018-4Q
- GFSI FF Document

- 2019-1Q
- Managing information
- FFPC



Quarterly Trends Update: Food Fraud Compliance and the Implications to Your Business: 3Q-2018

FSSC 22000

FSSC 22000 and Food Fraud Prevention

FSSC 5/9/2018

FSSC 22000 FF & FD Guidance documents

Non Conformity Grading – FF & FD

FoodFraud.msu.edu

Quarterly Trends Update: Food Fraud Compliance and the GFSI Food Fraud Technical Document / 4Q-2018

Webinar: Wednesday, December 12, 2018
1:00 to 2:00 PM ET

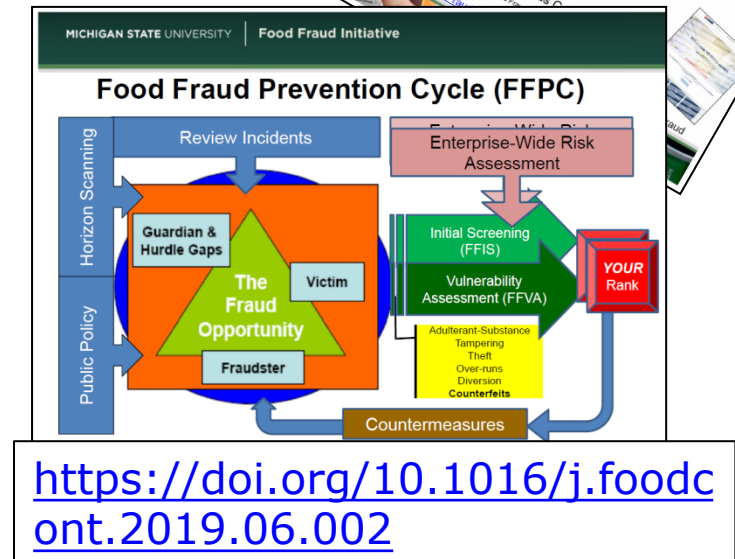
John Spink, PhD & Douglas C Moyer, PhD

GFSI Announcement 5/9/2018

Food fraud review:
• Blog, Technical Report

TACKLING FOOD FRAUD THROUGH FOOD SAFETY MANAGEMENT SYSTEMS

FoodFraud.msu.edu



Quarterly Trends Update Webinars Series

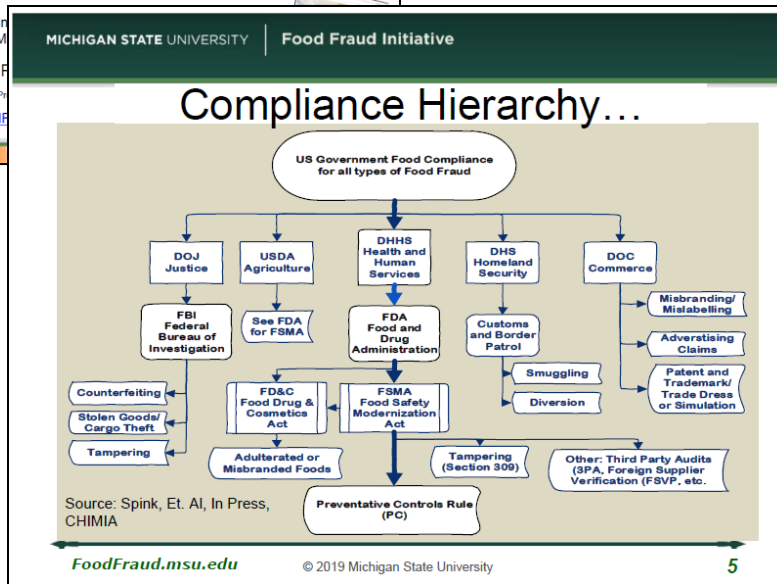
- 2019-2Q

- 2019-3Q

MICHIGAN STATE UNIVERSITY | Food Fraud Initiative

Quarterly Trends Update: Food Fraud Compliance for US Laws & Food Laws: 2019-Q2

Webinar: Wedn
2:00 to 3:00 PM
John Spink, F
Director & Assistant Pr
WWW.FoodFraudPrevention.com



MICHIGAN STATE UNIVERSITY | Food Fraud Initiative

Quarterly Trends Update: Annual Update and Action Plan 2020: 2019-Q3

Webinar: Tuesday, October 1, 2019
2:00 to 3:00 PM ET

John Spink, PhD & Douglas C Moyer, PhD
Director & Assistant Professor, Food Fraud Initiative
NEW Eli Broad Business College, MSU

FSM AI 11.1	Performance and supplier performance	A purchasing procedure shall be established, implemented and maintained to ensure that all inputs to the process including externally sourced materials and services which have an effect on food safety, conform to specifications as well as food safety and regulatory requirements.
FSM AI 11.2	Performance and supplier performance	A procedure for the evaluation, approval and continued monitoring of suppliers which have an effect on food safety, shall be established, implemented and maintained. The supplier approval process shall include means to procure in emergency situations. The results of evaluations, investigations and follow-up actions shall be recorded.
FSM AI 13.3	Performance and supplier performance	Outsourced processes that may have an effect on food safety shall be identified and controlled. Such controls shall be documented in the GFSI.
FSM AI 13.5	Performance and supplier performance	Specific policies shall be in place for the procurement of food from approved, certified sources.

GFSI REQUIREMENTS FOR PURCHASING

...of what? Review the scope.

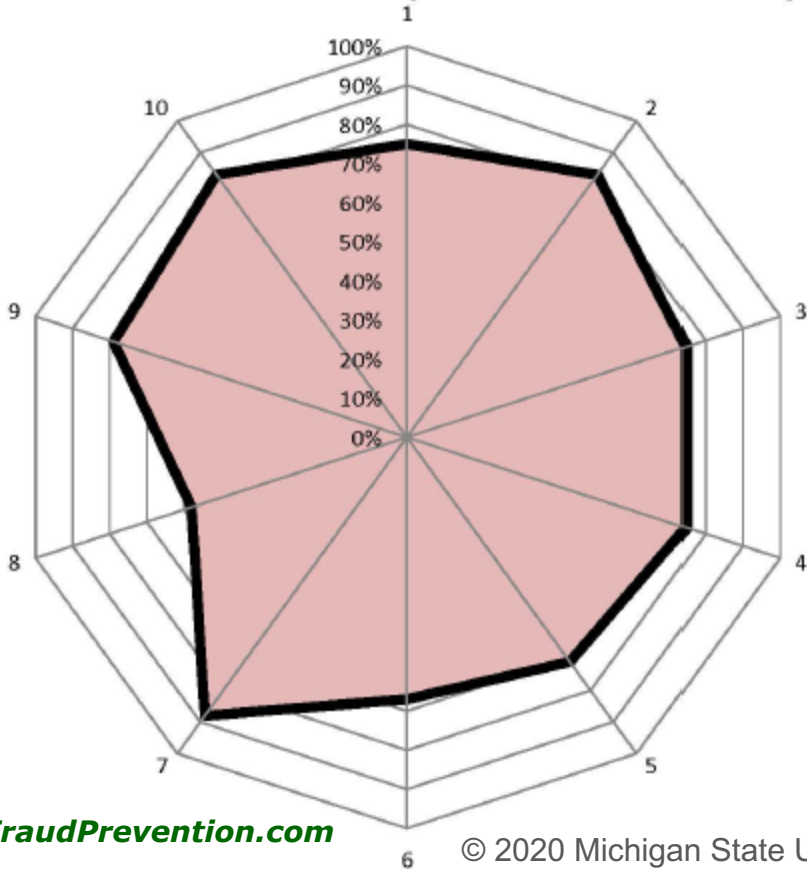
DEMONSTRATE IMPLEMENTATION

Food Fraud Annual Update Survey: Interim update, July 15, 2019

- ***There is overconfidence of covering “the relevant GFSI scope”:***
 - The average compliance confidence was 77% for implementing a Food Fraud Vulnerability Assessment (FFVA) and 68% for their Food Fraud Prevention Strategy (FFPS).
 - In addition, 37% stated a 100% confidence in their FFVA and 32% stated 100% confidence in their FFPS.
 - Overall, 53% stated they were 100% confident they covered "all types of fraud" and 52% that they covered "all types of products" – BUT only 33% included consideration of the GFSI compliance required "smuggling" and only 40% included "gray market/ diversion."
 - INSIGHT: There was overconfidence in the current compliance level since only 33% actually covered the entire "relevant GFSI Scope."

Food Fraud Annual Update Survey: Interim update, July 15, 2019

Result (0 to 100% confident) - July 15, 2019



- 1 (Q14). Have you conducted a Food Fraud Vulnerability Assessment?
- 2 (Q15). Is your Food Fraud Vulnerability Assessment Documented?
- 3 (Q16). Have you created a Food Fraud Prevention Strategy?
- 4 (Q17) Is your Food Fraud Prevention Strategy documented?
- 5 (Q18). Can you competently and thoroughly demonstrate implementation of your Food Fraud Prevention Strategy?
- 6 (Q19). Do you have "sign off" or "endorsement" of your Food Fraud Prevention Strategy by an executive or senior officer?
- 7 (Q20). Have you minimally conducted a Food Fraud Vulnerability Assessment in the last 12 months?
- 8 (Q21). Can you have a method or process to find your food fraud incidents or review general market incidents?
- 9 (Q22). Confirm your Food Fraud Vulnerability Assessment addresses ALL types of food fraud?
- 10 (Q23). Confirm your Food Fraud Vulnerability Assessment addresses ALL types of products?

SCOPE

WHAT IS GFSI COMPLIANCE (FSSC, SQF, IFS, BRC, ETC.)

GFSI Issue 7 Published Food Fraud Terms

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.

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**.

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.

Terminology (Types of Fraud)

Table 2: Table: Food Fraud Types, Definitions, and Examples (adapted from (Spink and Moyer 2011, Spink 2013, SSAFE Organization 2015, PWC PriceWaterhouseCooper 2016, GFSI 2017, Spink, Ortega et al. 2017))

- Dilution
- Substitution
- Concealment
- Unapproved Enhancements
- Mislabeling
- Gray Market Production/ Theft/ Diversion
- Counterfeiting (IPR)



APPENDIX: DETAIL OF TYPE OF FRAUD, AND EXAMPLES

Table 2: Table: Food Fraud Types, Definitions, and Examples (adapted from (Spink and Moyer 2011, Spink 2013, SSAFE Organization 2015, PWC PriceWaterhouseCooper 2016, GFSI 2017, Spink, Ortega et al. 2017))

GFSI (1) Type of Food Fraud	Definition from SSAFE (2)	Examples from GFSI FTTT (3)	General Type of Food Fraud
Dilution	The process of mixing a liquid ingredient with high value with a liquid of lower value.	<ul style="list-style-type: none"> Watered down products using non-potable / unsafe water Olive oil diluted with potentially toxic tea tree oil 	Adulterant-substance (Adulterant)
Substitution	The process of replacing an ingredient or part of the product of high value with another ingredient or part of the product of lower value.	<ul style="list-style-type: none"> Sunflower oil partially substituted with mineral oil Hydrolyzed leather protein in milk 	Adulterant-substance or Tampering
Concealment	The process of hiding the low quality of a food ingredients or product.	<ul style="list-style-type: none"> Poultry injected with hormones to conceal disease Harmful food colouring applied to fresh fruit to cover defects 	Adulterant-substance or Tampering
Unapproved enhancements	The process of adding unknown and undeclared materials to food products in order to enhance their quality attributes.	<ul style="list-style-type: none"> Melamine added to enhance protein value Use of unauthorized additives (Sudan dyes in spices) 	Adulterant-substance or Tampering
Mislabelling/ Misbranding	The process of placing false claims on packaging for economic gain.	<ul style="list-style-type: none"> Expiry, provenance (unsafe origin) Toxic Japanese star anise labeled as Chinese star anise Mislabeled recycled cooking oil 	Tampering
Grey market production/ theft/diversion	Outside scope of SSAFE tool.	<ul style="list-style-type: none"> Sale of excess unreported product, Product allocated for the US market appearing in Korea 	Over-run, Theft, or Diversion (4)
Counterfeiting (IPR)	The process of copying the brand name, packaging concept, recipe, processing method etc. of food products for economic gain.	<ul style="list-style-type: none"> Copies of popular foods not produced with acceptable safety assurances Counterfeit chocolate bars 	Counterfeiting (IPR)

Notes:
 (1) GFSI – Global Food Safety Initiative
 (2) SSAFE – Safe Secure and Affordable Food For Everyone
 (3) GFSI FTTT – Global Food Safety Initiative: Food Fraud Think Tank
 (4): Gray Market -- a market employing irregular but not illegal methods; Theft -- something stolen; Diversion/ Parallel Trade -- the act or an instance of diverting straying from a course, activity, or use

Defining Food Fraud

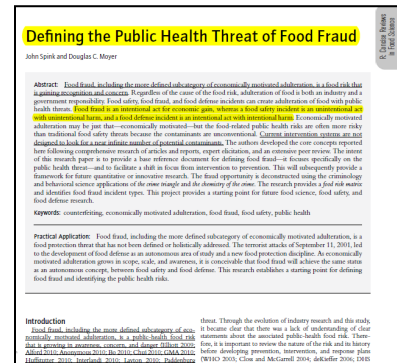
- **Action: *Intentional* deception for economic gain using food**
 - Consistent with GFSI, EC/EU, UK, ISO, and others...
 - Including the sub-category of “Economically Motivated Adulteration” or EMA
 - Note: FDA currently defines EMA as a “substance” for “economic gain”
- **Effect:**
 - Economic *Threat*
 - Public Health *Vulnerability or Threat*

Examples

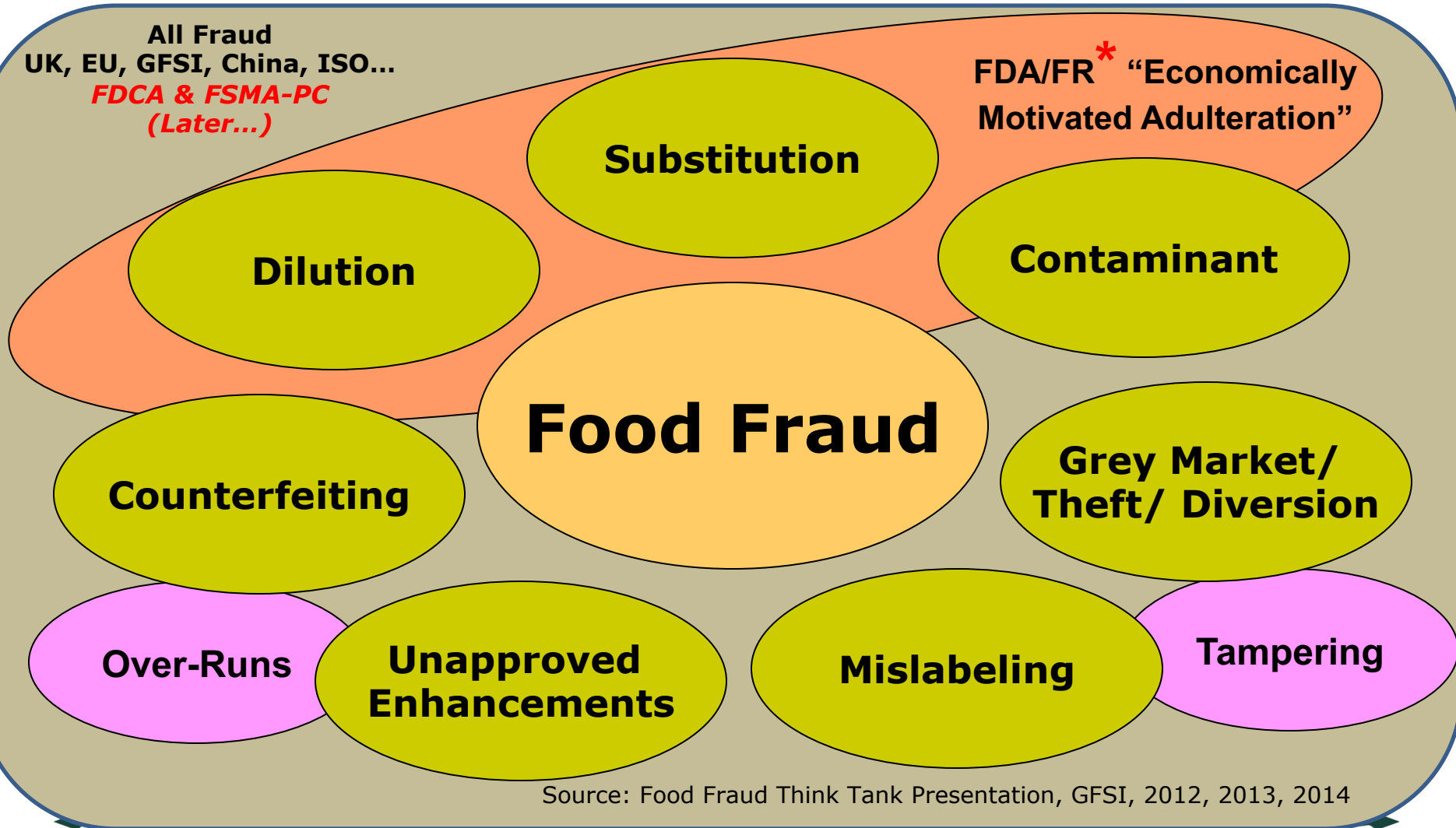
- Horsemeat in ground beef
- Peanut Corporation selling known contaminated product
- Diluted or extra virgin olive oil
- Melamine in pet food and infant formula
- Over-icing with unsanitary water

- Unauthorized unsanitary repackaging (up-labeling or origin-laundersing)
- Cargo Theft reintroduced into commerce/Stolen products
- Expired product date code tampering or “refreshing”

Reference: Spink & Moyer (2011). Defining the Public Health Threat of Food Fraud, Journal of Food Science



What is Food Fraud?



WHAT IS “REGULATORY COMPLIANCE”?

Food Fraud Compliance Requirements: Dates

- GSFI (FSSC, SQF, BRC, IFS, etc.) – January **2018**
 - Food Fraud Vulnerability Assessment (all fraud)
 - Food Fraud Prevention Strategy (all products)
 - **No documents = audit non-conformance**
- GFSI – Some mentions (BRC, IFS, etc.) – July 2015
- FSMA-Preventive Controls – September **2016**
 - **“The hazard analysis must be written regardless of its outcome” [21CFR507.33 (a)(2)]**
 - **“The hazard may be intentionally introduced for purposes of economic gain.” (iii)**
- Food Drug & Cosmetics Act & Adulterated Foods – **1938**
 - **Adulterated Foods**
 - **Misbranded Foods**
 - **+ others such as Sec. 301 Smuggling**
- Sarbanes-Oxley Act – **2002** and 2007
- ISO 22000: now added note of Food Fraud and Food Defense (Food Safety)
- ISO 12931, 22380, 27000, 28000 Supply Chain Security, etc. (Product Fraud)
- Codex Alimentarius: Food Fraud being defined with a management system

ANNUAL GAP ANALYSIS

Food Fraud Compliance Requirements: Scope



3
NEW

“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. Create a Food Fraud Prevention Strategy (Y/N)
4. Written (Y/N)
5. **<NEW> Demonstrate Implementation (Y/N)**
6. **<NEW> Executive Level Sign-off (Y/N)**
7. Minimally conduct an annual Food Fraud Incident Review (Y/N)
8. **<NEW> Method to review your incidents and general market incidents (Y/N)**
9. Note: Address all types of Food Fraud (Y/N)
10. 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!!!!**
- The formal and official process has started



Q: YES OR NO?

Food Fraud Annual Update: Process Review

1. Update incidents, review incident collection method and competence
2. Consider best practices and changes in the requirements
3. Develop modification plan
4. Get approval
5. Implementation plan for 2020 – document, get approval, schedule
 1. Finalize incident review for all fraud and all products
 2. Update FF vulnerability assessment -- document, get approval
 3. Update FF Prevention Strategy -- document, get approval
 4. Adjust all methods and processes -- get approval
 5. Prevent, Mitigate or **DISCLOSE** all unacceptable risks – document, get approval

**Document:
Gap Analysis
Annual
Review**

SSSSSSOOOOO WHAT???

E.g.: HACCP Recordkeeping

- A plan of action
- Demonstrate in place
- “Say what you do and do what you say.” = Prove it



**Managing Food Safety:
A Manual for the Voluntary Use of HACCP Principles for Operators of Food Service and Retail Establishments**

*Additional copies are available from:
Office of Food Safety
Retail Food and Cooperative Programs
Coordination Staff/Retail Food Protection Team (HFS-320)
Center for Food Safety and Applied Nutrition
Food and Drug Administration*

4. **Establish Procedures to Monitor CCPs.** Once been determined, someone needs to keep track through the operation. Monitoring involves making measurements to see that the CCPs are kept up established critical limits.
5. **Establish Corrective Actions.** While monitoring process or procedure will fail to meet the establish establishes a plan for what happens when a critical CCP. The operator decides what the actions will actions to the employees, and trains them in maintenance preventive approach is the heart of HACCP. Pr

7. **Establish a Record Keeping System.** There are certain **written records** or kinds of documentation that are needed in order to verify that the system is working. These records will normally involve the HACCP plan itself and any monitoring, corrective action, or calibration records produced in the operation of a the HACCP system. Verification records may also be included. Records maintained in a HACCP system serve to document that an ongoing, effective system is in place. Record keeping should be as simple as possible in order to make it more likely that employees will have the time to keep the records.

modified or improved.

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.

Plus:
FF
Policy

FFVA:
Rank

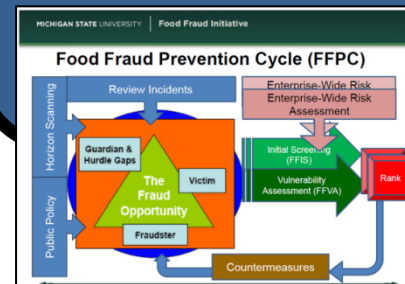
FFPS:
Method

Plus:
FF Audit
Results

MICHIGAN STATE UNIVERSITY | Food Fraud Initiative

Case Study: Corporate Risk Map

	Likelihood	VH	H	M	L	VL	Detail
Consequence		1	2	3	4	5	Incoming 1-VH*M: xxx Outgoing A-VH*M: zzz B-VH-L: aaa D-VH-L: bbb
VERY HIGH	A	1	2	3	4	5	
HIGH	B	2	3	4	5		
MEDIUM	C	3	4	5			
LOW	D	4	5				
VERY LOW	E	5					



Acknowledgements

- **MSU Supply Chain Management:** Ex-Chair Cheri Speier-Pero, Dr. Ken Boyer, Dr. John MacDonald, Ex-Chair David Closs, Dr. Stan Griffis, Dr. Judy Whipple, Dr. Steven Melnyk, Dr. Claudia Rosales, Dr. Justin Jagger, Dr. Jason Miller
- **MSU Veterinary Medicine:** Dean Christopher Brown, Chair Dan Grooms, Chair Ray Geor, Dr. Wilson Rumbelha, Cindy Wilson, Dean John Baker
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- **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
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- **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

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Twitter: [Food Fraud](#) and [#FoodFraud](#)

www.FoodFraudPrevention.com

MOOC programs: www.FoodFraudMOOC.com



Upcoming Webinar

Are You Ready for FSMA Intentional Adulteration Inspections?

Tuesday, February 4, 1pm ET

Registration invitation to follow via email

REPOSITRAK.COM