



An Update of GFSI-related Food Fraud Compliance for Packaging Suppliers

John Spink, PhD

Director, Food Fraud Prevention Academy

Assistant Professor,
Department of Supply Chain Management,
Business College, MSU

*2009 Packaging PhD [34th] / Adjunct Professor,
School of Packaging, MSU*

www.FoodFraudPrevention.com



PJR Webinar

Guest Webinar

Wednesday, February 21,
2024 at 11:00am ET

LinkedIn and #FoodFraud





Resources: Food Fraud Prevention Think Tank

Textbook: Food Fraud Prevention (Spink, 2019)

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

- With a **'certificate of completion'** based on **assessments**
 - On-demand, ten professional training hours
1. Food Fraud Prevention Overview MOOC
 2. Food Fraud Prevention Audit Guide MOOC
 3. Food Defense Threat Audit Guide MOOC
 4. Food Fraud Vulnerability Assessment & Prevention Strategy (VACCP)
 5. *Developing an Organic Fraud Prevention Plan (with OTA)*
 6. *Food Fraud & Enterprise Risk Management (ERM)*
 7. *Food Fraud Supply Chain Management & Procurement <NEW>*
 8. *Food Fraud – Advanced Criminology (for OPSON) <NEW>*

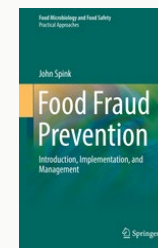
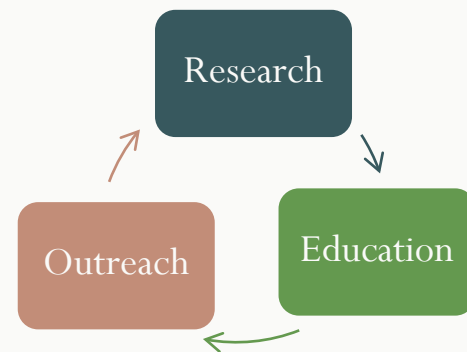
Also:

1. *USDA NOP – Organic Fraud and the Criminal Mind (See USDA.gov)*
2. *USDA NOP – Preventing Organic Product Fraud (See USDA.gov)*

Executive Education: July 24 – 28, 2023; Oct-23; Jan-24 (Detroit area)

- (Includes invitation-only/ brand owner-only sessions)
1. Food Fraud Overview
 2. Food Fraud Implementation Strategy (FFVA/FFIS, FFPS)
 3. Food Prevention Annual Update

Reports, Primer Documents, Scholarly Works, Videos and Training



Link to Textbook:

<http://www.anrdoezrs.net/links/9101220/type/dlg/https://www.springer.com/us/book/9781493996193>



Resources: Food Fraud Prevention Think Tank

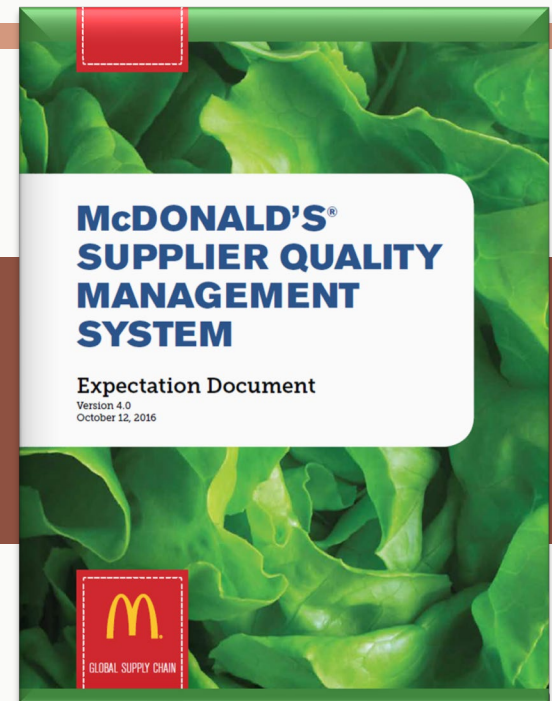
NEW – MoocLive!

Live, interactive webinar versions of the on-demand courses:

- Registration:
- March 18, 29, 25, & 27 (9-11 am)
- [Webinar B: Supply Chain Management MOOC and Audit Guide MOOC – March 2024](#)
- <https://foodfraudpreventionthinktank.com/course-product/mooclive-webinar-b-march-18-2023/>

Professional Education

- (Executive Education)
- **SAVE THE DATE**
- Food Fraud Compliance for Packaging Suppliers Workshop – May 14-16, 2024
- East Lansing, Michigan/ Hybrid online
- www.FoodFraudPrevention.com
- <Registration to open soon>

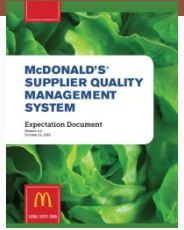


Why you care?

...compliance and customer requirements



- If you sell packaging into the food industry then you ARE in the FOOD industry.
- You are subject to the FOOD laws and regulations.
- Not complying is often criminal.



Expectation Document

2 FOOD SAFETY AND QUALITY MANAGEMENT SYSTEMS

2.1 General Requirements

Suppliers shall establish, implement, document, and maintain food safety and quality management systems and continually improve their effectiveness to meet McDonald's requirements (see 9.19) and all applicable laws and regulations. Suppliers shall demonstrate the effectiveness of such systems via documented processes, control measures and audit (see 9.2) results.

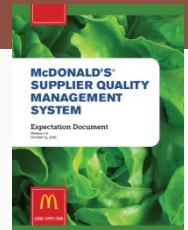
Working together, we can ensure that we all operate according to the high standards of McDonald's supply chain.

2.1 General Requirements

- Suppliers shall establish, implement, document, and maintain
- **food safety and quality management systems** and
- continually improve their effectiveness to meet McDonald's requirements (see 9.19) and
- **all applicable laws and regulations.**
- Suppliers shall demonstrate the effectiveness of such systems via documented processes, control measures and audit (see 9.2) results.

What is a FS Management System?

Some or all?

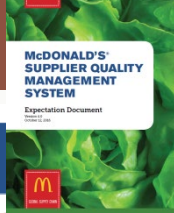


Food Safety System

- 6.1 HACCP System
- 6.2 Testing
- 6.3 Food Allergens and Sensitivities
- 6.4 Traceability
- **6.5 Food Fraud Prevention**
- [Note: 5.0 Fundamental Requirements; 5.1 Food Defense – address later... similar]

6.1 HACCP System

Before the application of HACCP (see 9.16), suppliers shall implement the fundamental Prerequisite Program which includes personal hygiene requirements (see 5.2.1). A documented risk analysis for raw materials, as well as a written HACCP plan shall be established for each product according to the seven principles under the Codex Alimentarius Commission's recommendation. The HACCP plan shall be validated (see 9.29) and implemented at all facilities. The HACCP plan shall also be reviewed at least annually and proper revisions shall be made and documented as product or processes change.



6 FOOD SAFETY SYSTEM

A food safety management system shall be in place for protecting the food supply from biological, chemical, and physical hazards to prevent

Food Fraud Prevention

6.5 Food Fraud Prevention

Suppliers shall perform a risk analysis on ingredients and raw materials to assure compliance to food safety and quality requirements and avoid threat of Food Fraud (see 9.8). Controls to reduce or eliminate this risk shall be implemented and a vulnerability assessment shall be documented.

• 6.5 Food Fraud Prevention

- 1) Suppliers shall perform a **risk analysis** on **ingredients and raw materials**
- 2) to assure compliance to food safety and quality requirements and avoid
- 3) **threat of Food Fraud** (see 9.8).
- 4) Controls to reduce or eliminate this risk shall
- 5) be implemented and
- 6) a vulnerability assessment shall be documented.

43 of 6,630 words...
what???



Food Fraud Definition

- 9.7 Food Defense
- Documented procedure and practices to protect the food supply against intentional contamination due to sabotage, terrorism, **counterfeiting**, or other illegal, intentionally harmful means.
- **9.8 Food Fraud**
- The fraudulent and intentional substitution, dilution, addition, or
- misrepresentation of food, food ingredients or
- **food packaging**, labeling, or
- false statements made about a product for economic gain that could
- adversely impact consumer health.

The packaging or protect the product

9.7 Food Defense

Documented procedure and practices to protect the food supply against intentional contamination due to sabotage, terrorism, counterfeiting, or other illegal, intentionally harmful means.

9.8 Food Fraud

The fraudulent and intentional substitution, dilution, addition, or misrepresentation of food, food ingredients or food packaging, labeling, or false statements made about a product for economic gain that could adversely impact consumer health.

GFSI: "Food fraud: A collective term encompassing the **deliberate and intentional substitution, addition, tampering or misrepresentation of food, food ingredients or food packaging, labelling, product information or false or misleading statements made about a product for economic gain that could impact consumer health.**" (GFSI Benchmarking Requirements, 2017)



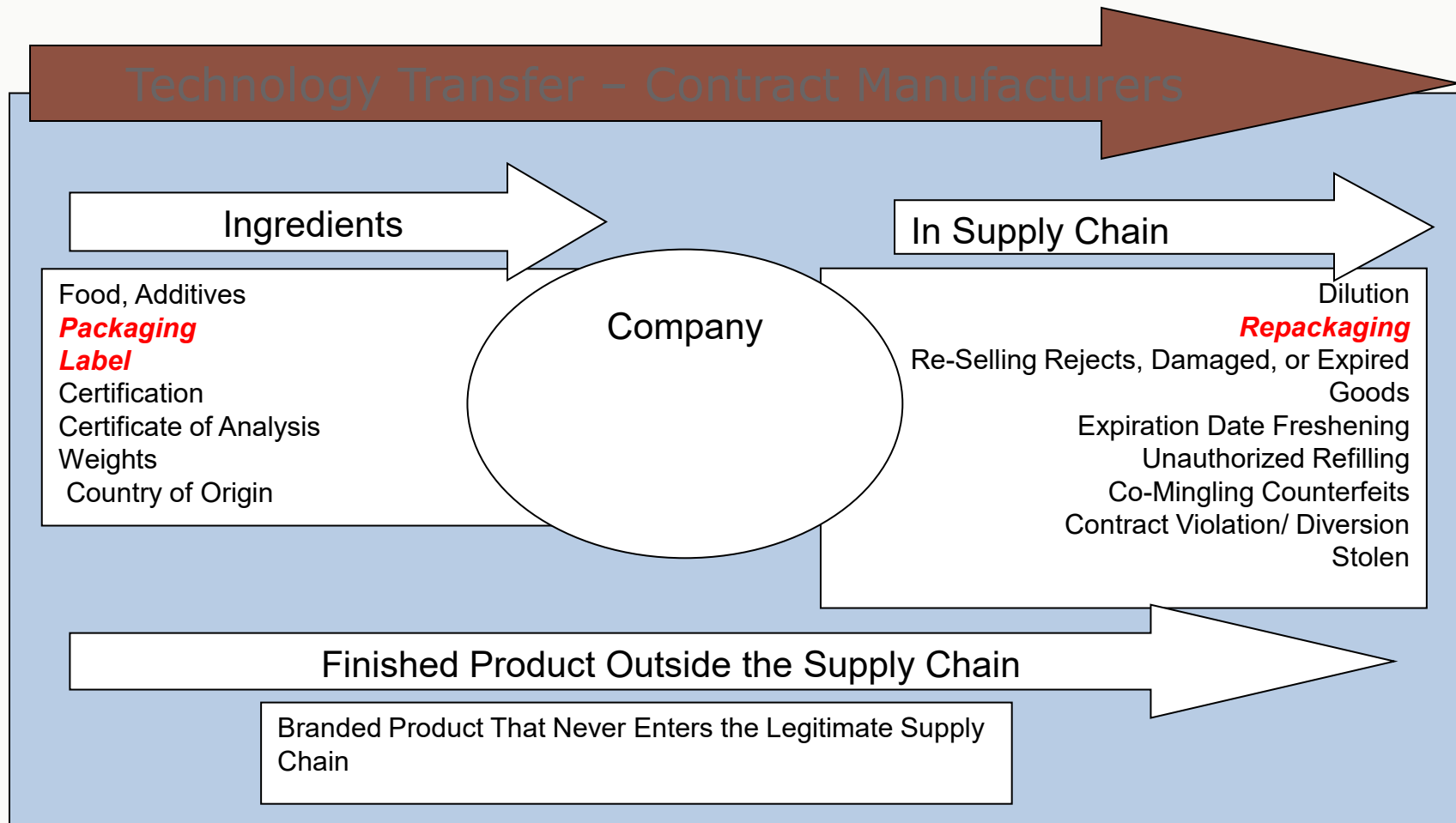
GFSI Position Paper on Food Fraud

- “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.

• Reference: GFSI Position on Mitigating the Public Health Risk of Food Fraud, July 2014



Food Supply Chain Vulnerabilities





GFSI Packaging Requirements

- What is the (1) package and (2) packaging?
 - Package: the container and components
 - Packaging: the process of filling the package
- Who is responsible for what:
 - Package seller
 - Package buyer
 - Package user
- Requirement: HACCP, TACCP, VACCP



Scheme Scope and Key Elements

“The objective of **Part III – M – Production of Food Packaging** is to define:

- “the requirements for the food safety management systems to be in place in the scheme’s standard for GFSI scope of recognition **M – Production of Food Packaging**,
- “the requirements for the Good Practice requirements to be in place in the scheme’s standard for GFSI scope of recognition **M – Production of Food Packaging**,
- “the requirements for HACCP or HACCP based requirements to be in place in the scheme’s standard for GFSI scope of recognition **M – Production of Food Packaging**.



Scope



“GFSI scope of recognition **M – Production of Food Packaging** includes the following products, services, or methods of production:

- “Production of food and feed packaging,
- “packaging materials,
- “packaging components in the form of
 - raw materials, part processed, semi-converted, converted or fully finished packaging materials and products for use in the supply chain.



Package Seller

- FSM M 1.2 - **Food Safety** Management - for Packaging Materials General Requirements - The management system shall ensure that packaging used to impart or provide a functional effect on food such as shelf life extension shall, where known, be effective within its own specified criteria.

Topic	Action1	Action2
HACCP (& Quality Control)	Assessment	Plan
TACCP	Assessment	Plan
VACCP	Assessment	Plan



Package Buyer

- FSM M 15.1 Purchasing - The standard shall require that the organisation controls the supply management processes to ensure that all externally sourced materials and services which have an effect on food safe ***packaging materials*** conform to specifier and regulatory requirements including food fraud mitigation plan requirements.
- FSM M 15.4 Purchasing (non-approved supplier) - Use of non-approved suppliers shall be acceptable in an emergency situation provided the facility has been assessed and the product meets the specification.



Package User



- Not specifically defined in Part III M but in other HACCP, TACCP, and VACCP requirements.
 - Assessment
 - Plan
 - Monitor



Package- Food *Defence*



- Requirement

FSM M 20.1	Food defence threat assessment	The standard shall require that the organisation have a <u>documented</u> food <i>defence</i> <u>threat assessment</u> procedure in place to identify potential threats and prioritise food defence measures.
FSM M 20.2	Food defence plan	The standard shall require that the organisation has a <u>documented</u> plan in place that specifies the measures the organisation has implemented to <u>mitigate the public health risks</u> from any identified food <i>defence</i> threats.
FSM M 20.3	Food defence plan	The standard shall require that the organization's Food defence plan and shall be supported by the organisation's Food Safety Management System.



Package- Food *Fraud*

- Requirements



FSM M 21	Food fraud vulnerability assessment	The standard shall require that the organisation has a <u>documented <i>fraud</i> vulnerability assessment</u> procedure in place to identify potential vulnerability and prioritise fraud mitigation measures.
FSM M 22.1	Food fraud mitigation plan	The standard shall require that the organisation has a <u>documented plan</u> in place that specifies the measures the organisation has implemented to <u>mitigate the public health risks</u> from the identified <i>fraud</i> vulnerabilities.
FSM M 22.2	Food fraud mitigation plan	The standard shall require that the organization's fraud mitigation plan and shall be supported by the organisation's Food Safety Management System.

Now meeting the requirements



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.



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)

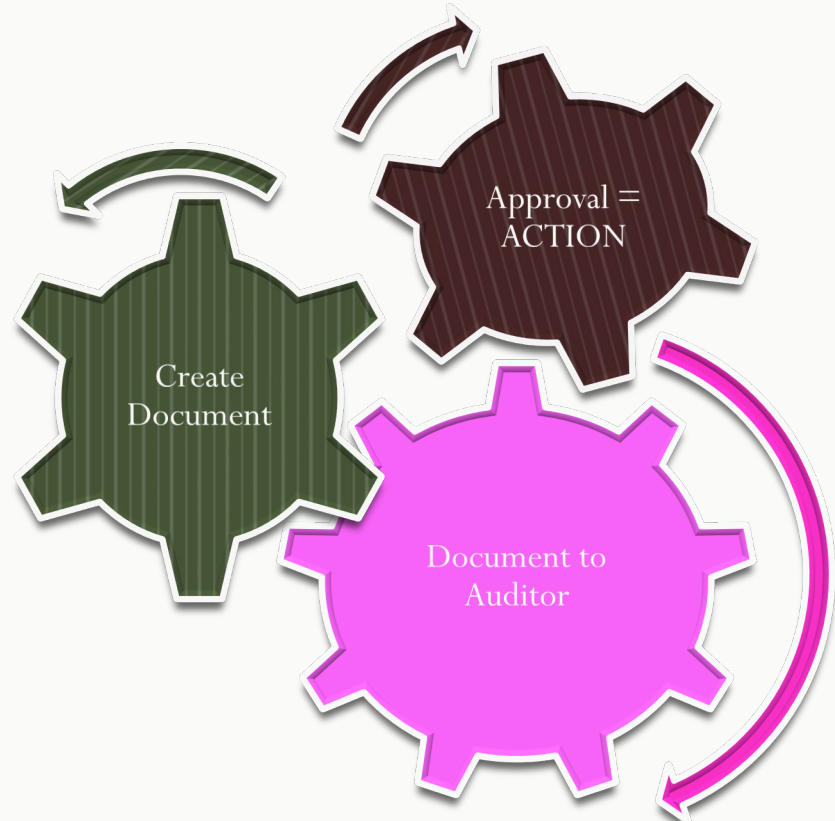
• Reference:

- **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?



Discussion

John Spink, PhD

SpinkJ@msu.edu

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

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