

# PJRFSI – Partner for Food Safety

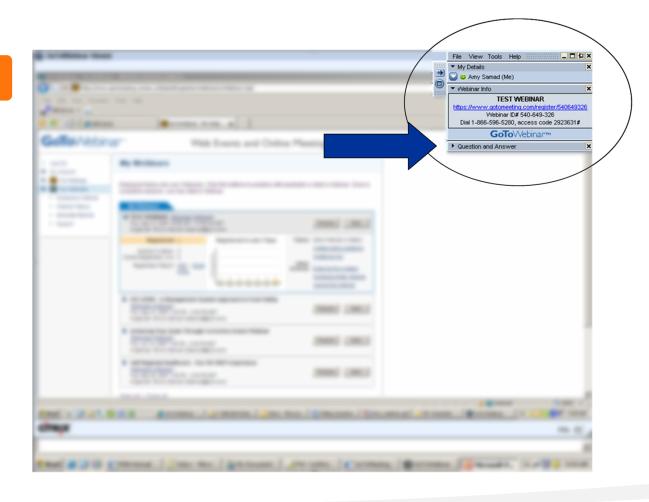
**Capabilities, COVID & FOOD FRAUD** 

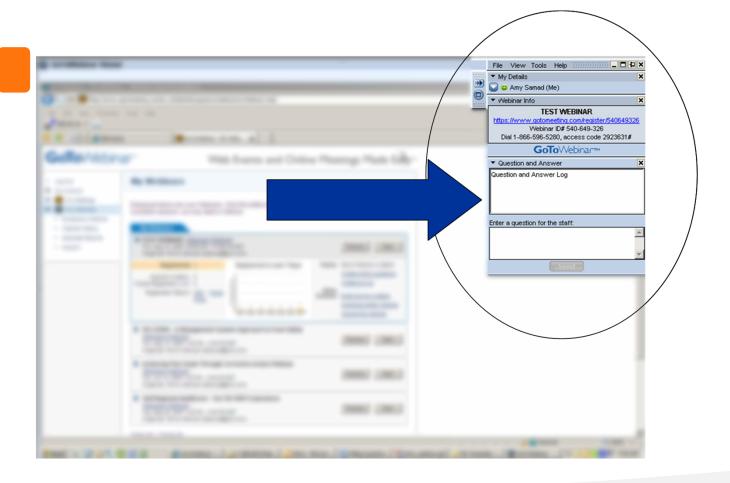
"A Joint Webinar, with Dr. John Spink"











# POLLING QUESTION # 1



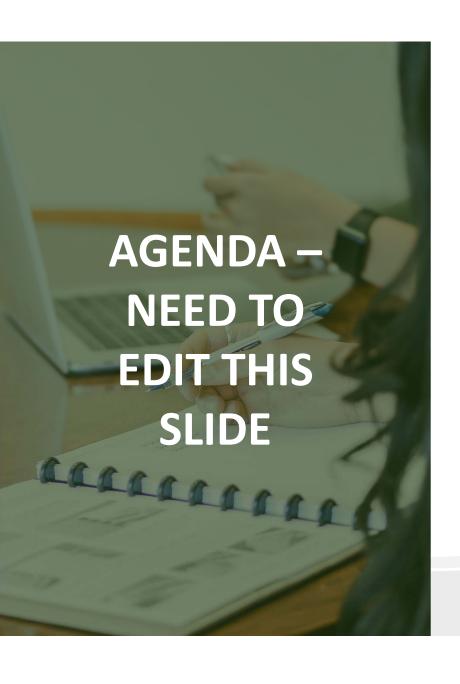


# PJRFSI – Partner for Food Safety

#### **Paul Damaren**

Senior Vice President of Food Safety & Supply Chain, PJRFSI





**01** Who is PJRFSI?

O2 Polling Question #2

What PJRFSI is Doing About It, a CB Perspective

O4 Polling Question #3

John Spinks – FEATURE PRESENTATION
Food Fraud

Polling Question #4

**07** Questions & Answers

#### PERRY JOHNSON REGISTRARS, FAMILY of COMPANIES





#### **Working with the Entire Food Supply Chain**







Farm



Marketer



**Food Processor** 



Wholesaler Distributor



**Exports** 



Retailer



Consumer



#### **Our Services**

The Certification and Inspection industry has been deemed an essential service!

Here is a link of all Essential Services Canada

Here is a link of all Essential Services USA



#### **Auditing & Certification**

Third party risk-based certification of products and systems provides a solid infrastructure for organizations to maximize business performance, increase efficiency, drive continual improvement and manage risk.



#### **Supply Chain Solutions**

Your companies supply chain is very complex and the need to manage these risks globally has never been more important. Perry Johnson Food Safety Inc. can help you control and eliminate many of the risks you face today in your supply chain.



#### **Customer Specific & Second Party Auditing**

Protect your brand and minimize recalls by building a robust supplier end-to-end program which will improve supplier processes, mitigate risk. Establish confidence your product vision is protected.



#### **Training Solutions**

Speak to us about our customized onsite training options for your company. We conduct training to countless standards globally.



# Perry Johnson Registrars Food Safety Inc.

FOOD SAFETY & SUPPLY CHAIN



Supply Chain Assessments

**Brand Protection** 

Food Safety, Quality,

Social Accountabil EHS, OHS

Recall, Regulatory, Food Fraud



Good Manufac uring Practic ood Agricultur Practices

Cannabis/Hemp (Retail, Manufacturing, Cultivation)

IACCP (Seafood, Laundry)



**THIRD PARTY** 

QF, BRC, FSSC,

Cosmetics, OTC's

GLOBALG.A.P, GFCP

ISO 22000, PrimusGFS





Costco, Ranch & Harvest Audits

**FSMA** 

Whole Foods

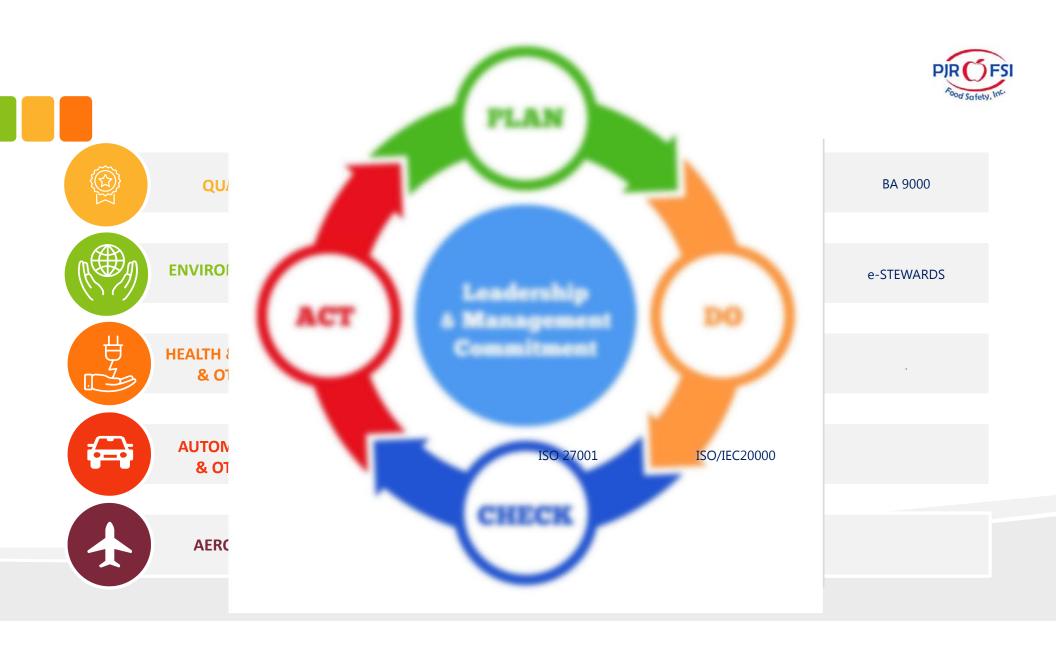
Custom 19,2nd, pro

**Product Attr** Testing





**FSVP** 





# Recognized Globally, Applied Locally **Standards, Accreditation and Scheme Owners**





















































### **PJRFSI COVID-19 Corporate Policy**



 PJRFSI is take pandemic verified technology.

# Coporate Policies

ng the d use of virtual



# **GFSI Stance on Temporary Audit Measures During Covid-19 Pandemic**





#### **Precautions for On-site Audits**

#### Our Auditors are required to



Coronavirus (CoV) are a large family of viruses that cause illness ranging from the common cold to more severe diseases such as Middle Eastern Respiratory Syndrome (MERS-CoV) and Severe Acute Respiratory Syndrome (SARS-CoV). Coronaviruses are zoonotic, meaning they are transmitted between animals and people.

- Stay home if they feel sick or have a fever
- Refrain from auditing if they have travelled to high risk areas in the last 14 day
- Wash hands, sanitize phones and equipment prior to and during the audit
- Carry hand sanitizer
- Wear a mask
- Avoid contact with personnel and stay within 6 feet if possible
- Drive in own vehicle between sites



At PJR FoC's, we have embraced our "New Reality" and have gone virtual to protect our customers, our employees & our families!

#### Why Perry Johnson Food Safety?



- o (Source: www.iaar.org) Industry Association of Accredited Registrars
- Over 30 Years Of Auditing

#### 2. Value Added Partner

- o Complimentary plaque to every client
- o Complimentary certificate
- o Free webinar training
- o Free press release & marketing tools for your business
- o Option of virtual assessments
- B. PJRFSI has the <u>resources, capability, established infrastructure</u> and commitment to support your mission, objectives and requirements.
- 4. PJRFSI will become your **trusted partner** for the following reasons:
  - Our ability to align with your organization to achieve your food risk and brand protection objectives.
  - The technical expertise of field based audit and leadership & account management teams.
  - Delivery of real time management information.
  - Delivery of a close and transparent partnership with your organization
  - Unparalleled expertise to be your partner in food safety management system assessments.





## POLLING QUESTION # 2





## Food Fraud - What You NEED to Know



### John Spink, PhD

Director, Food Fraud Initiative Assistant Professor, Supply Chain Management Eli Broad Business College, MSU

- Introduction to Supply Chain Management (SCM 303)
- Procurement and Supply Management (SCM 371)

www.FoodFraudPrevention.com

Twitter @FoodFraud #FoodFraud





#### **Food Fraud Prevention Resources**

**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)





#### **Executive Education**

(Includes invitation-only/ brand owner-only sessions)

- 1. Food Fraud Prevention Annual Update
- 2. Food Fraud Management Strategy
- 3. Food Fraud Initial Screening FFIS/ FFVA Workshop

Reports, Primer Documents, and Scholarly Works

**Videos and Training Links** 

Link to Textbook::

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



# WARNING: Counterfeiters Attend Anti-Counterfeit Conferences

# Global Trends

# CRIMINAL LIABILTY FOR CORPORATE LEADERS

- Health Hazards
- Financial Reporting

## COVID-19 Update

- Massive supply chain disruptions
- Ongoing an future supply challenges
- #1: "Assurance of Supply"
- #2: Don't forget...
  - FSMA and FD&C Act are still in effect
  - You are required to provide safe and legal product
  - Legal/ regulatory requirements still include "adulterated foods" and "misbranded foods" requirements

...question...

### FOOD FRAUD COMPLIANCE REMINDER

## **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"
- Motivation: Economic Gain
  - "Food Defense" motivation is traditionally harm or terror
  - "Food Defense (FDA/FSMA-IA)" is narrowed to "wide-scale human health harm"
- 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 (uplabeling or origin-laundering)
- 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

Link to MSU-FFI Glossary:

http://foodfraud.msu.edu/2018/03/20/for-comment-glossary-of-food-fraud-related-terms-03-2018-please-participate/

#### The Food Risk Matrix

#### **Prevent by Understanding the Motivation**

Food Quality	Food Fraud	Motivation  Gain: Economic
Food Safety	Food Defense Wide-scale health hazards	Harm: Public Health, Economic, or Terror
Unintentional	Intentional	
Action		

Source: Adapted from: Spink (2006), The Counterfeit Food and Beverage Threat, Association of Food and Drug Officials (AFDO), Annual Meeting 2006; Spink, J. & Moyer, DC (2011) Defining the Public Health Threat of Food Fraud, Journal of Food Science, November 2011

# Preferred Term for 'Intentional deception for economic gain using food'

- "Food fraud," 50%
- "Economically motivated adulteration" EMA, 15%\*
  - (\*multiple definitions)
- "Food protection," 9%
- "Food integrity," 7%
- "Food authenticity," 5%
- "Food crime," 2%

<u>Terminology Team:</u> Brian Bedard (GMA), John Keogh (Henley U), Larry Goodridge (McGill U), Joe Scimeca (Cargill), Doug Moyer (MSU), Akhila Vasan (GMA), Leon Bruner (GMA)

#### Hierarchy of Food Fraud Related Terms

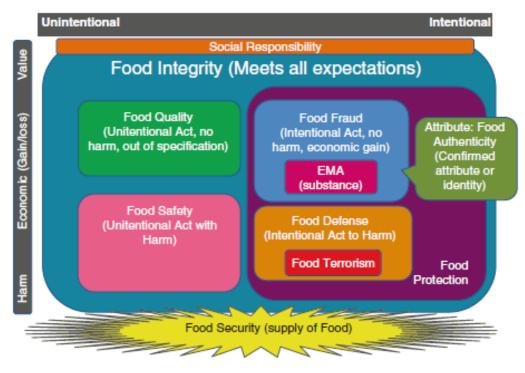


Fig. 1.5 Hierarchy and relationship of food fraud-related terms with the addition of food protection, food integrity, food authenticity, social responsibility, and food security

# A Reminder: Food Fraud Compliance Requirements: Dates

- GSFI (FSSC, SQF, BRC, IFS, etc.) January 2018
  - ~65% of world food trade, core for food safety management system
  - Required: Food Fraud Vulnerability Assessment (all fraud)
  - Required: Food Fraud Prevention Strategy (all products)
    - No documents = audit non-conformance
      - No certification = no sales (or at least a LOT of explaining)
- FSMA-Preventive Controls September <u>2016</u>
  - "The hazard analysis must be written regardless of its outcome" [21CFR507.33 (a)(2)]/ 21CFR117.130
  - (i) The hazard occurs naturally;
  - (ii) The hazard may be unintentionally introduced; or
  - (iii) The hazard may be intentionally introduced for purposes of economic gain."
- Food Drug & Cosmetics Act & Adulterated Foods 1938
  - Two sections: Adulterated Foods and Misbranded Foods
- Sarbanes-Oxley Act
   — 2002 and 2007
  - A risks to revenue are disclosed or confirmed to be managed

## POLLING QUESTION # 3



#### GFSI Announcement 5/9/2018

- Food fraud review:
- Blog, Technical Report





http://www.mygfsi.com/files/Technical\_Documents/201805-food-fraud-technical-document-final.pdf

# GFSI Published Food Fraud Requirements

#### 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.
 Every 'vulnerability' does NOT need a control plan.

#### 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.

...question...

# WHAT YOU NEED TO KNOW (WHAT YOU NEED TO DO)

## Food Fraud Compliance Requirements – Programs

- GSFI (FSSC, SQF, BRC, IFS, etc.) January 2018
  - ~65% of world food trade, core for food safety management system
  - Required: Food Fraud Vulnerability Assessment (all fraud)
  - Required: Food Fraud Prevention Strategy (all products)
    - No documents = audit non-conformance
      - No certification = no sales (or at least a LOT of explaining)
- FSMA-Preventive Controls September 2016
  - "The hazard analysis must be written regardless of its outcome" [21CFR507.33 (a)(2)]/ 21CFR117.130
  - (i) The hazard occurs naturally;
  - (ii) The hazard may be unintentionally introduced; or
  - (iii) The hazard may be intentionally introduced for purposes of economic gain."
- Food Drug & Cosmetics Act & Adulterated Foods 1938
  - Two sections: Adulterated Foods and Misbranded Foods
- Sarbanes-Oxley Act
   — 2002 and 2007
  - A risks to revenue are disclosed or confirmed to be managed

"Just a Check Box" – yes and no

- There is often a criticism that some audits are just a checkbox – did it, check. For this stage right now?
- YES! Absolutely.
- The formal and official process has started



Q: YES OR NO?

35

## Food Fraud Compliance Requirements: Scope

Review - Trade Journal Articles on Food Fraud Compliance Requirements for GFSJ, September 19 and Sarbanes - Oxley

And Sarbanes - Ox

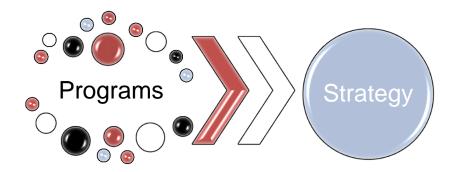
"Food Fraud Compliance Requirements — The general compliance requirements for Food Fraud prevention are:

- 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. Demonstrate Implementation (Y/N)
- 6. Executive Level Sign-off (Y/N)
- 7. Minimally conduct an annual Food Fraud Incident Review (Y/N)
- 8. 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?", <a href="http://www.newfoodmagazine.com/33890/newfood-magazine/past-issues/issue-1-2017/issue-1-2017/digital-version/">http://www.newfoodmagazine.com/33890/newfood-magazine/past-issues/issue-1-2017/issue-1-2017/digital-version/</a>

FoodFraudPrevention.com

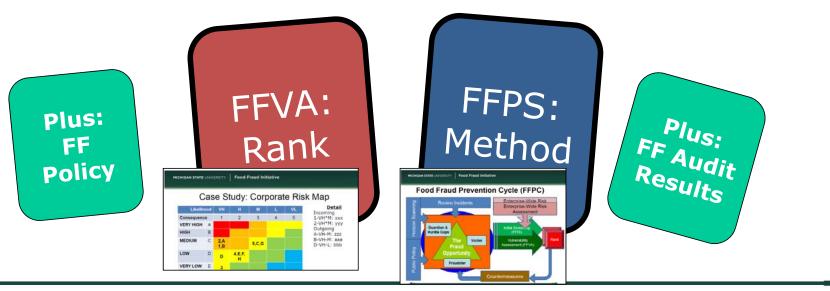
# Organizing Programs into a Strategy

 ...review current projects and write on a white-board... group and organize...



### Required Documents – Food Fraud

- Food Fraud Vulnerability Assessment
  - Clarify details: at least annual, etc.
- Food Fraud Prevention Strategy
  - Clarify details: covers all fraud and all products, etc.



FoodFraudPrevention.com

© 2020 John W Spink

# II. Food Fraud Prevention Strategy Implementation Series of Activities



- Convene a Food Fraud Task Force
- Create an Enterprise-wide Food Fraud Policy/Mission Statement and begin drafting a Food Fraud Prevention Strategy/ Plan
- 3. Conduct the pre-filter Food Fraud Initial Screening (FFIS)
- 4. Review additional needs including additional information or a more detailed Food Fraud Vulnerability Assessment (FFVA)
- 5. Review specific Food Fraud vulnerabilities in an enterprise risk map (Enterprise Risk Management)
- Consider countermeasures and control systems to address the 'very high' and 'high' vulnerabilities
- 7. Propose a Food Fraud Prevention Strategy including the calibration of the Food Fraud risks on the enterprise risk map

Reference: Spink, Moyer & Whelan (2016). The role of the public private partnership in Food Fraud prevention—includes implementing the strategy. Current Opinion in Food Science

FoodFraudPrevention.com

© 2020 John W Spink

#### Call to Action

- 1. Conduct a gap analysis 10 questions
- 2. Review most basic compliance requirements
- 3. Identify key compliance programs to define your scope.
- Seek common training and guidance start with trusted partners

FoodFraudPrevention.com

# Discussion

John Spink, PhD

SpinkJ@msu.edu

Twitter: Food Fraud and #FoodFraud

www.FoodFraudPrevention.com



Link to Textbook::

http://www.anrdoezrs.net/links/910 1220/type/dlg/https://www.springer. com/us/book/9781493996193

MOOC programs: www.FoodFraudMOOC.com



## POLLING QUESTION # 4



#### **Confirmed Upcoming Webinars**





Tuesday May 19th at 2:00pm EST

#### **COVID19 – Scheme Update and Next Steps**

FSSC 22000 Version 5 update, the impact of ISO 22000; 2018, the advantage of the HLS in integrating with other management systems, the new scopes- transport and storage, catering, retail and the relaunch of the FSSC Development Program. Featuring: Jacqueline Southee, North America Representative



Wednesday, May 27th at 2:00pm EST

A Joint Webinar with PJRFSI & PrimusGFS, Manage Risk & Crisis - What You NEED to Know!

Featuring: Scheme Owner - PrimusGFS/Azzule who will give an overview of their services and discuss the various challenges around COVID19 from a "Scheme Owner & Certification Body" perspective

Coming Soon – Webinars - <a href="https://www.pjrfsi.com/webinars/">https://www.pjrfsi.com/webinars/</a>











#### **Paul Damaren**

Senior Vice President, Food Safety & Supply Chain Perry Johnson Registrars Food Safety, Inc.

755 W. Big Beaver, Ste.1390 | Troy, MI 48084 USA

Canada Office: 519-954-7903

Cell: 226-972-1969

Corporate HQ: 248-519-2523

pdamaren@pjrfsi.com | www.pjrfsi.com

John W. Spink, PHD,
Assistant Professor
Michigan State University,
SPINKJ@msu.edu
(517) 381-4491

