



Food Authenticity Guide

Five steps to help protect your business from food fraud

July 2024

This guide is a five step process for businesses

It sets out a simple process for food businesses large and small to identify, prioritise and manage risk. This will help protect them from food fraud and ensure that the food sold is authentic.

The five steps should be thought of as a cycle that needs to be reviewed and repeated on a regular basis and particularly when there is a change in risk.

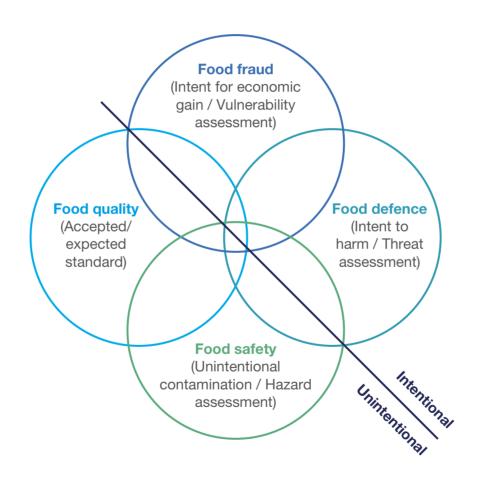


Food Risk

Any supply chain, no matter how simple or complex, can present risks that need to be adequately managed. This has always been the case, but as the global food supply system comes under increasing pressure from population increase, growing demand for limited resources and changing diets etc, food businesses need to be increasingly alert to the potential opportunities for food fraud within the supply chain.

Food businesses need to actively work with their suppliers and customers to identify and mitigate the risks and keep the risk assessments and risk management plans under regular review.

This diagram shows the interconnected nature of the different risks faced by food businesses. The main focus of this five-step guide is to help highlight the potential opportunities for food fraud within the supply chain and ensure that the food sold is authentic, but undertaking these five steps will also help identify other types of risks.



Food Risk Types taken from Global Food Safety Initiative – Tackling Food Fraud through Food Safety Management Systems

Food Fraud

Food fraud can affect any food business regardless of sector or size. It can involve the deliberate and intentional substitution, addition, tampering or misrepresentation of food and drink products for economic gain. It can occur anywhere in the food supply chain, from low quality raw materials and inferior food packaging to falsified documents and false or misleading statements on finished products. Food authenticity is about ensuring a food offered for sale is of the nature, substance and quality expected by consumers.

Food fraud poses a potential food safety risk for consumers and can mislead them as to the authenticity of the food. It can also result in financial and reputational damage for the food business and undermines consumer trust in food.

Tackling food fraud should be part of the overall Food Safety Management System which include risk assessments for food safety hazards, food fraud vulnerabilities and food defence threats. Food businesses also need to have a good food safety culture within their own workforce and with their suppliers which includes creating an anti-fraud culture. Many thirdparty supplier assurance and audit schemes now have modules on food safety culture.

Food businesses can also use external resources available through their trade associations and organisations like the Food Authenticity Network and the Food Industry Intelligence Network including authenticity testing and intelligence sharing to maintain the assurance and integrity of their own products and supply chains and minimise the potential opportunities for food fraud.

Food fraud is a type of food crime and should be reported to the authorities.

Some acts of food crime can pose potential food safety risks, as an unknown ingredient supply can invalidate even the best safety assurance measures. Malicious tampering is another type of food crime and involves an intent to harm. For England, Wales & Northern Ireland, the National Food Crime Unit (NFCU) is the dedicated law enforcement function of the Food Standards Agency leading on food crime

- Report a food crime: <u>online</u> or freephone 0800 028 1180
- <u>Food Fraud Resilience Self-</u> <u>Assessment Tool</u>

In Scotland, it is Food Standards Scotland's Food Crime Incidents Unit (SFCIU):

- Report a food crime: <u>online</u> or freephone 0800 028 7926
- Food Crime Risk Profiling Tool





1. Map your supply chain

Collect information to map your supply chain on a product basis

Considerations

- What is required to produce your product e.g. ingredients, packaging?
- Who are your suppliers and who supplies them?
- Which countries are your ingredients sourced from?
- In what form are you buying your ingredients, e.g., whole or powdered?
- What specific ingredient requirements do you have, e.g. organic, geographic origin, fair trade?
- What gives your product and its ingredients their value?

Checklist

- Collect information on all ingredients and suppliers
- Develop an ingredient supply chain map for each product
- Use expertise from both within your business and externally to help gather the relevant information

KEY OUTCOME: IN-DEPTH KNOWLEDGE OF INGREDIENT SUPPLY CHAIN





2. Identify risks

Look into the risks and potential opportunities for food fraud in your supply chain

Considerations

- What do you know about the countries you source your ingredients from e.g. are there any environmental, economic, geopolitical or seasonal issues which might impact supply?
- Are any ingredients currently or predicted to be in short or surplus supply or being offered out of season?
- Are any ingredients subject to media stories or campaign group concerns?
- Are there any upcoming regulatory changes or changes in trade tariffs/subsidies which might impact supply?
- Are you using an approved certified supplier or buying on the spot market?

- Has there been a history of food fraud/ food authenticity problems for a particular ingredient/category of ingredients?
- Is the price reflective of the ingredient being purchased or is a supplier offering a deal which seems 'too good to be true'?
- How robust and fit for purpose are your supplier assurance and audit schemes and procurement processes?
- Are you regularly changing ingredients, production processes or suppliers?
- Do your own processes add any further risks e.g. production or workforce?

Checklist

- Collect information on the main factors which may impact the sourcing of your ingredients.
- Identify risks in the supply chain in terms of both ingredients and suppliers and continuously monitor for changes.
- Use expertise from both within your business and externally to help gather the relevant information (e.g. <u>EU RASFF</u> & <u>INFOSAN</u>)

KEY OUTCOME: IDENTIFIED RISKS & POTENTIAL OPPORTUNITIES FOR FOOD FRAUD IN YOUR SUPPLY CHAIN





3. Assess & prioritise risk

Evaluate the risks and potential opportunities for food fraud in your supply chain

Considerations

- Which of the identified risks and potential opportunities for food fraud in your supply chain have the most significant impacts?
- What other supporting evidence and data is needed to help you prioritise your identified risks?
- How well do you know and trust your suppliers and how can you learn more about them, e.g. how long have you been dealing with them and what is their track record like?
- Are your processes for changing ingredients, production or suppliers robust and fit for purpose?

- What details do you know about your supplier's own supply chain risks e.g. length of supply chain, type of supply chain, direct or indirect suppliers, outsourced to third parties, spot market buying?
- What are the impacts of the identified risks to your food business, market presence and reputation?

KEY OUTCOME: ROBUST RISK ASSESSMENT FOR YOUR SUPPLY CHAIN

Checklist

- Assess and prioritise ingredients and supplier risk. Remember; anything that makes an ingredient more valuable might make it a higher risk. Suppliers with low nonconformities might be considered low risk.
- Create and regularly review a risk matrix that covers both likelihood and severity.
- Ensure strong links between procurement, regulatory and technical teams to help monitor and assess the potential risks and opportunities for food fraud.





4. Create & implement action plan

Define a set of actions to address the identified risks in your supply chain

Considerations

- How can the identified risks be mitigated and managed?
- Do you have ingredient specifications and a sampling/analysis plan?
- Do you have an approved supplier list with supplier assurance and audits?
- What steps can you take to double check the accuracy of information and documents presented?
- Is digitisation an option for your business both from a cost and logistical perspective?
- What is required to implement the action plan within your business?

- What test methods are available and what do the test results actually mean for your product?
- How can you get support from senior management?
- Who is responsible for delivering the different parts of the action plan within your business?
- What training is currently available within your business?
- What needs to be done when a concern is identified?
- What is required to implement the action plan with your suppliers?

Checklist

- Prepare an action plan setting out the identified risks and how they can be mitigated.
- Ensure senior management sign off the action plan and incorporate it into your Food Safety Management System and ongoing improvement in food safety culture.
- Communicate roles and responsibilities for delivering different parts of the action plan within your business and ensure staff receive appropriate training. Specific supplier auditing training should include modules on food fraud/food authenticity and food crime.
- Set out internal management procedures to follow in the event of identifying a concern.
- Build strong relationships with your suppliers through regular visits and set up meetings with them to discuss the risks and explain what you want them to do to mitigate them.

KEY OUTCOME: IMPLEMENTED SUPPLY CHAIN ACTION PLAN





5. Track, review & communicate

Action plan is tracked, reviewed, communicated and regularly updated



Considerations

- How can you ensure the action plan is delivered and understood across your business?
- How do you get your suppliers on board with the action plan and any necessary mitigation steps?
- How can you develop diversification plans to build resilience into the action plan?

- How does the action plan and its outcomes impact other aspects of the Food Safety Management System?
- What wider internal and external communications would enhance transparency and support for the action plan?
- What are your success criteria?

Checklist

- Action plan reviewed and communicated regularly, and particularly when there is a change in ingredient, supplier, emergence of a new risk or following a significant safety incident.
- Continuously monitor in real-time intelligence data and horizon scan for changes to risks which may affect the supply chain.
- Implement lessons learnt back into business operations e.g. for new products and processes.

KEY OUTCOME: ACTION PLAN IS INTEGRATED INTO THE BUSINESS & REGULARLY REVIEWED

> Think of the five steps as a cycle that needs to be reviewed and repeated on a regular basis. Any substantial change in the supply chain should trigger an automatic review.



Resources

The Food and Drink Federation (FDF) is a powerful unified voice for the UK's vibrant, resilient and diverse food and drink manufacturing industry.

We act on our members behalf on the businesscritical issues. Our members include the most recognisable food and drink brands to the most innovative start-ups, across all sectors of industry.

Being an FDF manufacturing member will equip you with the expertise to grow, protect and strengthen your business.

• FDF membership: reasons to join

Member only resources:

- FDF Incident Prevention and Management Toolkit (member only)
- FDF Regulatory Toolkit and Divergence Trackers (members only)
- FDF Regulatory Committees (members only)



The Food Authenticity Network (FAN) provides open access information related to food authenticity testing, food fraud prevention and supply chain assurance in one convenient open access location.



The Food Industry Intelligence Network (fiin) provides a 'safe haven' for the food industry to collate, analyse and disseminate information and intelligence on food authenticity. Leveraging collective insights from industry and regulators, FIIN enables a coordinated and targeted approach to supply chain assurance.

Further resources

- <u>FSA/NFCU Food Crime</u> Guidance for Businesses on how to spot and prevent food crime
- <u>BSI PAS 96</u> Guide to Protecting and Defending Food and Drink from Deliberate Attack
- <u>Campden BRI</u> Beating Food Crime How to defend your business against the threat of food fraud and malicious attacks
- <u>GFSI</u> Tackling Food Fraud through Food Safety Management Systems

fdf | FOOD & DRINK POWERS OUR NATION

The Food & Drink Federation (FDF) is the voice of the food and drink manufacturing industry – the UK's largest manufacturing sector.

We contribute over £30 billion to the country's economy, supporting half a million jobs in every region and nation, and producing products that are loved in the UK and beyond.

Find out more about our latest news and the work we do at:

FDF.org.uk X: @FoodanddrinkFed Linkedin