



Global Food Regulatory Perspective on Food Fraud Management

- Food Fraud, A Global Insight -

Global Food Regulatory Science Society, Webinar Series 24 May 2022 -

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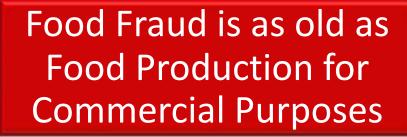
Full Professor, Food Risk Analysis and Regulatory Policies

Background





















Food Fraud: An Attempt to Define the Issue

□No formal definition in most regulatory frameworks... to date – Codex has worked on a unifying one

- □ Notions included in Food Fraud:
 - Deliberate act
 - Aims for economic gain in an illicit manner
 - Meant to be hidden / not to be discovered
 - Misrepresents the food product to consumers





Heightened Interest Resulting from High Visibility Incidents

Melamine Incident

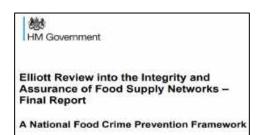
- □2007 (Feed, Companion Animal Food)/2008 (Dairy Products)
- Leading to over **300,000 illnesses** (Kidney stones and renal lesions)
- □6 deaths (infants/babies) in 2008

2013 Horsemeat Scandal

- ☐ Some 2700 samples tested in 28 European countries
- **□16** countries connected to the scandal
- ☐Some "beef" products contained as much as 100% horsemeat
- □2017 EU police arrest and charge 65 individuals







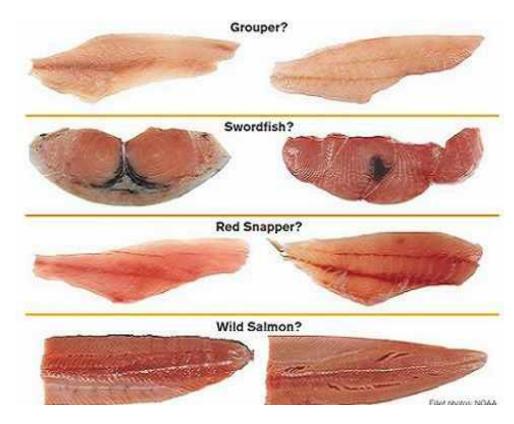




July 2014

Some Manifestations of Food Fraud

- ☐ Misrepresentation / mislabeling (intentional)
 - Different origin of food
 - Different species of meat/fish
 - Fraud on weight/volume



Generally no public health impacts





Some Manifestations of Food Fraud (2)

☐ Substitution / Dilution / Addition to mask dilution

- Dilution with water dilution with less costly ingredient (with or without substitution)
 - Addition of food grade / harmless food ingredient = no introduction of hazard
 - Addition / introduction of new hazard
 - (peanut)E.g. allergenic ingredient added where not expected = acute risk
 - Introduction of a "silent" hazardous substance, e.g. Sudan dyes in spices
 = chronic risk











- ☐ Food Fraud is meant to impact food quality but can have significant impacts on food safety
- ☐ It ceases to be "hidden"





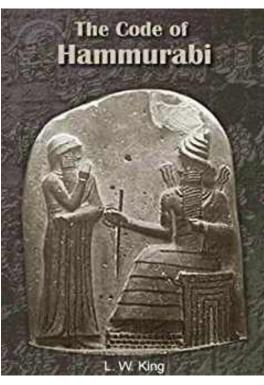






- ☐ Food Laws historically aimed primarily to address and prevent food fraud issues
- ☐ Historical food laws in the Antiquity)1750 BC – Hamurabi Code) addressed food fraud incidents to protect consumers and trade
- Description Level Level





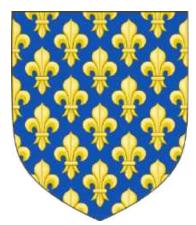


Start of Food Fraud Regulatory Requirements...

European Laws Middle Ages

- ☐ The Assize of Bread of 1266 in England regulated price, weight of a bread loaf as well as sales requirements (minimum amount to be sold)
 - Fines and prison / medieval penalties for fraudsters
 - Extended to Beer, Fish and Meat during the same century
- ☐Ordinance of John the Good (John II of France) ruled France from 1351: Bread Standard, Wine standard (quality requirements)









Moving to the Contemporary Period

1860: The Adulteration of Food and Drinks Act:

- ☐ To protect consumers from imported products
- □Not necessarily applicable to producers and wholesalers

1872: The Adulteration of Food and Drugs Act:

- ☐ Ability/Authorities to take Samples
- □ Responsibility attributed to Producers and Wholesalers





THE GREAT LOZENGE-MAKER.





Standards of Identity are a tool to preserve authenticity

□ 1890 Amendment permitting Government created Standards to become Regulations

□1894: First Canadian Standard



Could not afford others!





Food Fraud Impacts

BRAND DAMAGE

- For a Company
- For a Food Production Sector
- For a Country or Region

Economic Loss by Consumer: Consumer "Cheated"

Loss of Confidence & Trust in Production System & Oversight

Food Safety Impact /
Public Health Issue

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Lower Risk

Reactive Approaches

- ☐ General provisions of food law
 - ☐ Protection of consumers

Reactive with Stronger Penalties

☐ Provisions to create deterrents including for repeat offenses

Higher Risk

Preventive Approaches

- Requirements of vulnerability assessments
- ☐ Requirements to prevent /
 mitigate highest vulnerabilities
 (risk-based)













Addition of Food Fraud Requirements at Every Step of the Food Quality Pyramid

Traceability And Effective Recalls

HACCP, TACCP, VACCP Plan

Prerequisite Programs (PRPs)

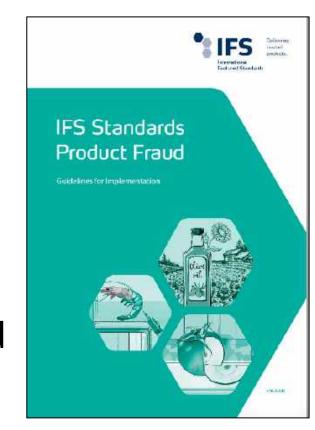




Focus on Prevention

Several Tools Developed by Industry to Support Food Fraud Prevention and Mitigation

- ☐ Tools useful for vulnerability assessments as part of food safety management systems:
 - International Featured Standards (IFS) IFS Standards Product Fraud
 Guidelines for Implementation
 - BRC Global Standards for food safety
 - SSAFE Food Fraud Tool (Netherlands)
- ☐Global Food Safety Initiative (GFSI) requirements for food fraud prevention and mitigation
 - United States Pharmacopoeia (USP) Food Fraud Mitigation Guidance
 Document



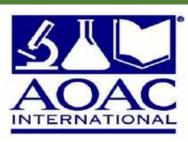




Food Fraud Analytical Environments

Analytical Methods are Key to Support:

- ☐ Assurance of food authenticity
- ☐ Detection of food fraud targeted adulterants in priority food commodities



AOAC International Established a Taskforce on Food Fraud:

- ☐ Led to the creation of 2 Working Groups:
 - 1. Development of SMPRs for non-targeted testing methods:
 - Methods to assess the authenticity of priority ingredients without targeting an adulterant – WG1
 - 2. Mapping existing targeted testing methodologies (known adulterant in priority ingredient) and suggest adapted AOAC processes to address large scale incidents when needed





Harmonized Guidance is Lacking ...

- ☐ Methods and Approaches for Vulnerability Assessment and Mitigation:
 - Multiple options.
 - Not necessarily open access.
- ☐ Tools Adapted to SMEs
- ☐ Laboratory Methods for Non Targeted Testing Not Harmonized
- ☐ Effective Sharing Amongst Food Regulators
- ☐ Harmonized Measures : Codex Leadership







Global Understanding of Food Fraud 2018



Towards
collaborative
leadership to
counter food fraud







29 - Plenary session-DIFSC

30 - Open sessions dedicated to food fraud



1 - Harmonization of food fraud regulatory policies

2 - Preventive measures for the food industry

 3 - Risk communication, information sharing and capacity building



Dubai World Trade Centre

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Organizers















Partners











Towards a Global Coalition of Thought Leaders





Areas of Focus...

Collaborative Leadership Amongst Food Regulators Reviewing Existing Tools / Guidance to Industry Analytical Methods: AOAC Leadership on Food Authenticity Assurance

Shaping an Agenda for International Co<mark>llab</mark>oration





Hoping to Shape Direction for ...

☐ Better Clarity and Availability in Food Fraud Prevention Tools

☐ Updated Food Regulatory Frameworks Tackling Food Fraud, focused on prevention







Collaboration is Needed for Future Developments

