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FOR FOOD SAFETY AND APPLIED NUTRITION AND UNITED STATES DEPARTMENT OF
AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE

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IMPROVING PRODUCT TRACING OF FOODS: MORE RAPID OUTBREAK RESPONSE

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DAY 2: SPECIFIC ELEMENTS AND ISSUES IN PRODUCT TRACING AND OUTBREAK RESPONSE

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December 10, 2009

9:00 a.m.

U.S. Department of Agriculture South Building, Jefferson Auditorium

1400 Independence Avenue, S.W. Washington, D.C. 20250

MODERATORS:

DR. STEPHEN SUNDLOF Center for Food Safety and Applied Nutrition Food and Drug
Administration

MS. SHERRI A. MCGARRY

Center for Food Safety and Applied Nutrition

Food and Drug Administration

Spink transcript comments here:

MR. SPINK: Good afternoon. I'd like to thank the Agency for the opportunity to present comments. Also I'd like to applaud the efforts to continue the public-private partnership programs in the State of Michigan. We've had a number of excellent engagements, including the Michigan Department of Agriculture's Ag and Food Protection Strategy Steering Committee led by Brad Deacon, Dr. John Tilden, and Jerry Wojtala.

I am John Spink. I'm an Assistant Professor and Associate Director of the Anti-Counterfeiting and Product Production Program in the School of Criminal Justice at Michigan State University, but my roots are in food safety and packaging.

What do I do? I develop and teach packaging for food safety in the Pro M.S. Food Safety master's program. I teach packaging module of food protection and defense, and I develop and teach the anti-counterfeit strategy and product protection course.

My research areas involve food fraud or economically motivated adulteration. I study the behavioral sciences behind the chemistry of the crime to focus on the opportunity and reducing the risk by reducing the opportunity. The concept is no different than general food science actions of reducing the amount of pathogen in the food even before the kill step – reducing the risk – by reducing the opportunity for a risk.

In addition, we have just received funding from the National Center for Food Protection and Defense for defining food fraud and the chemistry of the crime.

One other. I'm also the U.S. Chair for the Technical Advisory Group for ISO/TC 247, which is fraud controls and countermeasures. That's anti-counterfeiting.

My comments in general are to include food fraud considerations in the traceability initiative as you include both food safety and food defense.

The second main comment is to consider traceability programs integrated across all FDA and all consumer products, including drug, medical device, food, and then all consumer products. It is my opinion that the retailers and retail inventory management systems are a real key node, since this is the last transaction scanning at checkout before the product leaves the distribution system and is transferred to the consumer.

For food fraud, it's important to step back from the effect of adulteration to the motivation. While melamine in pet food was a public health threat, the cause or motivation was economic. Actions to reduce the opportunity or to deter should focus on the cause. This concept is presented in the food fraud matrix. It is important to remember that we're dealing with human actors who are trying to not get caught. Their actions are clandestine and stealth. They're actively trying to deceive. The fraudsters will use the very strength and trust of the traceability systems to hide their counterfeit product.

The point here is that there are a number of types of fraud or types of counterfeiting, adulterate, that would be melamine in pet food. Tamper, overruns, theft, diversion, simulations, and the traditional micro definition of full counterfeiting.

While these stretch the definition of intellectual property rights definition of counterfeiting, these are all key access points for counterfeit or fraud in a product to enter the supply chain.

There's three main specific food chain vulnerabilities to food fraud.

First, raw ingredients and components. That's the products getting into the supply chain, and then also there's legitimate supply chain products, products that move from a manufacturer

into the marketplace where there's some fraud, whether it's dilution or substandard products incorporated back in the system. There's also product that never enters the proprietary supply chain, a figure that I developed, it's important to demonstrate this.

For the open meeting, it is important to identify some of the specific risks and challenges for traceability. Traceability can offer benefits throughout this whole continuum.

To define the countermeasure objective, there are specific objectives in grand protection systems. Traceability initiatives can contribute to all.

The key is improving transparency.

Consider traceability programs integrated across all FDA and all consumer products. In fact, whenever I teach graduate courses, I have the students examine how and when traceability systems of all products will integrate.

Finally, in my concluding comments, thank you for the opportunity to present these comments. If you have any questions or comments, I can be reached through Michigan State University, at SpinkJ@msu.edu. Thank you.

MS. McGARRY: Thank you, Mr. Spink. Next we have Bob Carpenter, GS1 US, followed by Scott Goltry, American Meat Institute.

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MS. McGARRY: Thank you, Mr. Spink.