Include Food Fraud Considerations in Food Traceability

FDA Product Tracing Systems for Food; Public Meeting; Request for Comment [Docket No. FDA-2009-N-0523]

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### The Food Fraud Matrix

The Cause leading to the Effect of Adulteration

<table>
<thead>
<tr>
<th>Food Quality</th>
<th>Food Fraud</th>
<th>Economic Threat</th>
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</thead>
<tbody>
<tr>
<td>Food Safety</td>
<td>Food Defense</td>
<td>Public Health Threat</td>
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</tbody>
</table>

Un-Intentional | Intentional

Source: Adapted from: Spink (2006), The Counterfeit Food and Beverage Threat, Association of Food and Drug Officials (AFDO), Annual Meeting 2006
Types of Counterfeiting to Consider

- Adulterate
- Tamper
- Over-run
  - Licensee-Fraud
  - Re-Manufacturing
  - Unauthorized Refill
- Theft
- Diversion
  - Smuggling
  - Parallel Trade
  - Origin Laundering
- Simulation
- Counterfeit
Food Supply Chain Vulnerabilities

Ingredients
- Food, Additives
- Packaging
- Label
- Certification
- Certificate of Analysis
- Weights
- Country of Origin

In Supply Chain
- Dilution
- Repackaging
- Re-Selling Rejects, Damaged, or Expired Goods
- Expiration Date Freshening
- Unauthorized Refilling
- Co-Mingling Counterfeits
- Contract Violation/ Diversion
- Stolen

Finished Product Outside the Supply Chain
- Branded Product That Never Enters the Legitimate Supply Chain

Source: Chapter: Defining Food Fraud & The Chemistry of the Crime, Improving Import Food Safety, Institute of Food Technologists, 2010
Define the Countermeasure Objective

- **Authentication**
  - Prove Genuine
  - Prove Fake
  - Build Consumer Confidence

- **Traceability**
  - Where it has been
  - Where it is going
  - Find product

- **Transparency...**

- Supply Chain Optimization

- *Integrate Systems Across all Food/Drug/Consumer*
A Strategic Solution to Food Fraud

- Monitoring all imported product is not practical.
- Monitoring all international food manufacturing is not practical.
- Focus on the root of the risk and actions...
  - *The chemistry of the crime*: Criminal, Victim, and Opportunity
- The Strategy
  - Intelligence Gathering
  - Create a Public Forum
  - Create Awareness & Harmonization

(Source: Spink, 2009, AAAS Conference)
End of FDA Presentation

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