FOOD AUTHENTICITY
FIVE STEPS TO HELP PROTECT YOUR BUSINESS FROM FOOD FRAUD
Food and drink manufacturers rely on their supply chains to ensure consumer choice, affordability, consistent quality of products and continuity of supply. Any supply chain, no matter how simple or complex, can present risks that need to be adequately managed. As the global supply system comes under increasing pressure from population increase, growing demand for limited resources and changing diets, companies also need to be alert to the potential for food fraud and actively work with their customers and suppliers to identify and mitigate the risks of food fraud.

Food fraud is committed when food is deliberately placed on the market for financial gain, with the intention of deceiving consumers or customers. Although there are many kinds of possible food fraud, the Food Standards Agency (FSA) notes on its food fraud webpage two main types: the sale of food which is unfit and potentially harmful; and the deliberate misdescription of food. On top of the existing robust legislative frameworks, strengthening of intelligence sharing and analysis is key to minimising fraud and informing industry’s own activity to maintain the assurance and integrity of its products and supply chains. FDF’s support to its members on incident prevention and horizon scanning includes active engagement with members, with the FSA and Department for Environmental Food and Rural Affairs (Defra) and with retailers and other stakeholders in the UK, Europe and globally.

This simple guide, which follows on from FDF’s Guide on ‘Sustainable Sourcing: Five Steps Towards Managing Supply Chain Risk’, sets out a step-by-step process to help food and drink manufacturing businesses of all sizes protect their businesses from food fraud by helping them to identify, prioritise and manage upstream supply chain food authenticity risks.

Alongside this guide, further resources are also available on the FDF website.
INTRODUCTION

MAP YOUR SUPPLY CHAIN
Collect information to describe your supply chain on a product basis from a food authenticity perspective

QUESTIONS TO CONSIDER:
• What is required to produce the product, e.g. ingredients, water, packaging, transport?
• Who are your immediate suppliers?
• Who supplies them? Think about suppliers all the way back to source.
• Are you changing a supplier or process?
• From which countries are key resources sourced and what do you know about them, e.g. are there any geopolitical issues?
• What are the critical resources for your business?
• What gives the product and its ingredients their value?
• What specific ingredient requirements do you have, e.g. organic, halal, geographical origin, fair trade
• On what basis do you buy the ingredients, e.g. are any traded on a specific property such as colour or nitrogen content?
• Have you considered seasonality of supply?

GETTING STARTED:
• Use expertise from both within your business and outside, such as your trade association and other intelligence sharing networks, to help gather the relevant information
• Start by mapping major product categories i.e. those that are most critical for your business
• Gather information from suppliers to identify those who are most at risk, e.g. via questionnaire and supplier assurance and audit processes
• Create a visual and statistical map of your product supply chain

KEY OUTCOME: SUPPLY CHAIN MAP
**IDENTIFY IMPACTS, RISKS & OPPORTUNITIES**

Understand the key risks and opportunities for food fraud in your supply chain

### QUESTIONS TO CONSIDER:

- Is anything that you are sourcing in short supply and/or the subject of media or other concern?
- Have there been changes in the products, processes or supply chains your business depends on?
- Are your supplier assurance and audit systems fit for purpose?
- What are the risks to your business, market presence and reputation?
- Are there possibilities to do things differently (try to imagine the mindset of those who may seek to commit food fraud)?
- Is a supplier or potential supplier offering you a deal which seems ‘too good to be true’?
- Can you identify any other changes to the ingredients, processes or supply chains that can constitute a risk?
- Does your own production process add any further risks?

### GETTING STARTED:

- Make sure you are aware of the main factors which may impact on your supply chains (ie economic and seasonal variables)
- Identify resources that could be the target of fraud because of their value or associated sensitivities
- Think about key materials and whether there is any history of authenticity problems
- Conduct scenario planning: consider the risk if certain resources were to become unavailable or to be substituted
- Gather information from suppliers on identified supply chain risks, including whether they have action plans in place
- Include in your risk assessment information from other sources, such as your trade association and other intelligence sharing networks
- Continuously monitor in real-time for changes to risks in the supply chain, e.g. environmental and economic changes which may affect supply chain

**KEY OUTCOME:** UNDERSTANDING KEY RISKS AND OPPORTUNITIES
ASSESS AND PRIORITISE YOUR FINDINGS

Analyse how your business can manage food authenticity related risks and take advantage of opportunities to limit food fraud.

QUESTIONS TO CONSIDER:

• What are your key risks and who are the associated suppliers?
• Have you prioritised supplier risk separately, e.g. type of supply chain, direct or indirect suppliers, outsourced?
• How well do you know your suppliers, e.g. how long have you been dealing with them and what is their track record like?
• How can you learn more about them, e.g. partnerships, supplier schemes?
• Are your processes for appointing new suppliers robust?
• Do you have full visibility of your supply chain?

GETTING STARTED:

• Ensure strong links between procurement and regulatory/technical teams to help monitor and assess the key risks and potential opportunities for food fraud.
• Ensure you are using your supplier assurance and audit systems to help you to assess and prioritise supplier risk.
• To help assess risks, make the most of external sources of information, e.g. your trade association.
• Create a risk matrix (e.g. changes in regulatory requirements, supply and demand imbalances, resilience of supply chain and documented cases of fraud) to help with prioritisation.
• Assess what is business essential.
• Make sure you know what you are buying, have agreed specifications and have monitoring and compliance checks in place.
• In your supplier assurance systems, be aware of the need to keep under scrutiny the possibility of your suppliers outsourcing to third parties.

KEY OUTCOME: IMPROVED KNOWLEDGE ON HOW TO MANAGE RISKS AND OPPORTUNITIES
CREATE A PLAN OF ACTION

Define a set of actions to reflect the risk of food fraud and prioritise the opportunities to limit it already established.

QUESTIONS TO CONSIDER:

• How can the identified risks be mitigated?
• What measures are feasible to address the priority risks?
• Who is responsible for delivering the different parts of the plan?
• How can you get support from senior management to address these actions and incorporate them into company strategy?
• How best can you involve your suppliers?
• What are your success criteria?

GETTING STARTED:

• Consider the effectiveness of your chosen supplier assurance systems in limiting the opportunities for food fraud and mitigating the risk from authenticity issues (including prioritisation of supplier risks)
• Consider the role of authenticity testing
• Set up internal communications to explain why you are doing this and what is expected of colleagues (let all know that their views and observations are welcome)
• Set up meetings with suppliers about the risks you have prioritised and explain what you would like to achieve
• Ensure senior management sign-off of the company’s strategy. Consider using external expertise, particularly to address risks where you have no immediate solution

KEY OUTCOME: ACTION PLAN BASED ON KEY RISKS AND OPPORTUNITIES
IMPLEMENT, TRACK, REVIEW & COMMUNICATE

Ensure action is taken, progress tracked, and communicated

QUESTIONS TO CONSIDER:
• What is required to implement the action plan with suppliers?
• How best can you measure and report progress to senior management and across the broader organisation?

GETTING STARTED:
• Consider integrating relevant parts of the action plan into your supplier assurance and audit systems
• Agree a timetable for reviewing the action plan and regularly check it is on track
• Make sure all employees involved have the support and resources they need - consider any company training needs
• Consider broader internal communication and opportunities for external communications to enhance transparency and support
• Think of all five steps as a cyclical process that needs to be reviewed and repeated on a regular basis, as well as in response to substantial changes in the supply chain, to ensure that it remains current
• Continue to gather real-time data and horizon scan for substantial changes in the supply chain which should trigger a process review
• Implement the lessons learnt back into business operations, e.g. for new products and processes

KEY OUTCOME: FULLY IMPLEMENTED ACTION PLAN INTEGRATED INTO THE BUSINESS
HELP FOR SMALL BUSINESSES

If you are a smaller business and don’t know where to start, try answering a few basic questions first.

- What are your key raw materials?
- Where do they come from?
- How resilient is their supply chain?
- How do you protect your business from food fraud?

ABOVE ALL THINK RISK AND PLAN AHEAD

For further information, visit the FDF website