BRITISH COFFEE ASSOCIATION

FOOD AUTHENTICITY

6 steps to help protect your business from food fraud

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This guide is continually updated to help give guidance to businesses to protect themselves from food fraud. Based initially on the FDF Food Authenticity Guide, this latest version has been updated to ensure consistency with the recently revised BRC Global Standard on Food Safety. It focuses on six steps designed to help identify, prioritise and manage upstream supply chain food authenticity risks.

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 web page 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.

The BCA would like to thank the FDF for the use of the **Food Authenticity Five Step Guide** and also the BCA Food Authenticity Sub-Committee: -

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Alongside this guide, further resources are also available on the FDF website: www.fdf.org.uk

*See **Appendix** for full definition and **Glossary of Terms** used in food fraud documentation.

Establishing Your Internal Team

Determine the competencies you require to both map your supply chain(s) and create a plan of action

Questions to consider:

- As a business can your clearly define the risks you are looking to prevent?
- Have you mapped the areas of expertise you require to build a team to respond to those risks?
- Can you bring in team members who understand:
    - The principles of food fraud and why it is important
    - The risks associated with the green bean, supply chain and processed product
    - Techniques of risk and vulnerability assessment
- Will there be technical and quality assurance aspects to be addressed?
- Is there a need for purchasing input to address availability and price concerns?
- Do production aspects, including goods receipts, need to be covered?
- Are there gaps in knowledge or expertise that might need to be filled externally, e.g. consultants?

Getting started:

- Be clear in the project's aims and objectives and clearly communicate to all team members
- Bring together the necessary expertise, from internal and external (as required) sources to create a team able to map supply chains and create an action plan.
- Ensure you consider all aspects of the chain for vulnerability and co-opt relevant expertise.

Key outcome: Appropriately skilled and resourced team assembled

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 export processing mill/ manufacturer as a minimum, or further if customer/product claims require?
- 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 coffee its value e.g. specific provenance?
- What specific ingredient requirements do you have, e.g. product certification schemes, origin or provenance, Arabica and or Robusta split?
- On what basis do you buy the coffee, e.g. any, traded, on a specification requirement?
- Have you considered seasonality of supply?
- State of raw material in natural form or processed (easily identifiable)
- Ease of access to raw material through to supply chain

Getting started:

- Use expertise from both within your business and outside, such as the BCA and other intelligence sharing networks such as the FDF and Defra, to help gather the relevant information.
- Start by mapping major coffee sources 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 questionnaires, supplier assurance, audit processes, verification and certification.
- Create a map of your product supply chain.

Key outcome: Supply chain map

Identify Impacts, Risks & Opportunities

3

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 commit food fraud? (see **glossary** for definition).
- 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 coffee processes or supply chains that may constitute a risk?
- Ease of testing - simple, complicated or not available.
- Are there emerging risks (e.g. Covid-19) which have the potential to impact directly or indirectly on the coffee supply chain?
- Have you considered both risk and opportunities that link to existing or future brand integrity claims.
- Are there specific risks, such as allergens, that need to be addressed?

Getting started:

- Make sure you are aware of the main factors which may impact on your supply chains (i.e. economic and seasonal variables).
- Identify resources that could be the target of fraud because of their value or associated sensitivities e.g. provenance.
- Think about coffee and whether there are any history of authenticity problems.
- Gather information from suppliers and/or brokers, on identified supply chain risks, including whether they have action plans in place.
- Include in your risk assessment information from other sources such as the BCA and other intelligence sharing networks e.g. FDF.
- Continuously monitor for risks in the supply chain, e.g. environmental and economic changes (ethical, fair trade, single) which may affect supply chain.

Key outcome: Complete risk assessment

Assess & Prioritise Your Findings

4

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 e.g. back to processing mill/manufacturer as a minimum or further if customer/product claims require?

Getting started:

- Ensure strong links between procurement and regulatory or 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 include outsourcing to third parties.
- To help assess risks, make the most of external sources of information, e.g. BCA and FDF.
- 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.
- Make sure you know what you are buying, have agreed specifications signed by both parties and have monitoring and compliance checks in place. Does your purchasing and delivery paperwork support this? Things to consider ISO 24114 and Arabica, Robusta split and country of origin.
- Assess what is business critical.

Key outcome: improved knowledge on how to manage risks and opportunities

Create a Plan of Action

5

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

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 do you ensure 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?
  - Setting KPI's
  - Establishing your team
- Customer requirements?

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).
- Traceability exercises
- Country of origin documentation
- Consider the role of authenticity testing, for Instant (ISO 24114) or for bought-in Roast and Ground.
- Ensure your plan is implemented and communicated internally.
- Meet 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

6

Ensure action is taken, progress tracked, and communicated

Questions to consider:

- What factors will drive or bring about the need for a review of the plan?
- 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:

The plan should be kept under review to reflect changing economic and market intelligence circumstances. An annual review should be considered but also:

- When there is a change in supplier.
- When there is the emergence of a new risk (such as a known adulteration or change in formation related to the authenticity of products or raw materials).
- Following a significant product safety incident (e.g. product recall) where the authenticity of products or raw materials is implicated.
- 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 six 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 data and scan for changes in the supply chain which should trigger a process review.

Key outcome: Fully implemented action plan integrated into the business

Appendix

Food Fraud Definition

The deliberate and intentional substitution, mislabelling, adulteration or counterfeiting of food, raw materials, ingredients. This definition also applies to outsourced processes.

Examples may include (although are not limited to) the following:
- Deliberate and intentional substitution (replacement of premium ingredients with those of a lower grade)
- mislabelling (misleading provenance claims)
- adulteration (the full or part replacement of a foodstuff with erroneous material)
- counterfeiting (the full or part replacement of a product with a surrogate item such as chicory in coffee)

Glossary of Terms:

Adulteration
The addition of an undeclared material into a food item or raw material for economic gain.

Authenticity/Authentic Product
Food authenticity is ensuring that food for raw materials is purchased and offered for sale; are of the nature, substance and quality expected.

Batch (also may be defined as "lot")
The quantity of material prepared or required for one production operation.

Food Defence
Procedures adopted to ensure the safety of raw materials and products from malicious contamination or theft.

Food Fraud
Fraudulent and intentional substitution, dilution or addition to a product or raw material, or misrepresentation of the product or material, for the purpose of financial gain, by increasing the apparent value of the product or reducing the cost of its production.

Food Integrity
Products that are of the nature, substance and quality expected (e.g. not substituted, diluted, adulterated or misrepresented).

Food Security
Procedures adopted to ensure the continued availability of raw materials and products.

Good Manufacturing Practice (GMP)
Implemented procedures and practices undertaken using best-practice principles.

Malicious Contamination
Deliberate contamination of a product or raw material with the intention to cause harm to the consumer or damage to the company or brand owner.

Processed food
A food product which has undergone any of the following processes: Aseptic filling, baking, battering, blending, bottling, breading, brewing, canning, coating, cooking, curing, cutting, dicing, distillation, drying, extrusion, fermenting, freeze-drying, freezing, frying, hot-filling, irradiation, micro-filtration, microwaving, milling, mixing, being packed in modified atmosphere, being packed in vacuum packing, pasteurisation, pickling, roasting, slicing, smoking, steaming or sterilisation.

Risk Analysis
A process consisting of three components: risk assessment, risk management and risk communication.

Risk Assessment
The identification, evaluation and estimation of the levels of risk involved in a process to determine an appropriate control process.

Root Cause
The underlying cause of a problem which, if adequately addressed, will prevent a recurrence of that problem.

Threat Assessment
A risk assessment designed to examine site processes for potential product security and food defence issues.

Traceability
Ability to trace and follow raw materials, components and products through all stages of receipt, production, processing and distribution both forwards and backwards.

Vulnerability Assessment
A risk assessment designed to examine processes and supply chains for potential food fraud. BRC Global Standards has developed a guideline to assist site with vulnerability assessments.

ISO 24114: The International standard for Instant Coffee – criteria for authenticity. The current version is ISO 24114:2011

Help for Small Businesses

For further help contact the BCA

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**.

Developed from FDF Food Authenticity Five Step Guide
www.fdf.org.uk/food-authenticity.aspx

BRITISH COFFEE ASSOCIATION

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passionate about food & drink