

BRC Global Standard for Packaging and Packaging Materials

P552: Position Statement - Clarification on 'food defence' and 'food fraud' in the Packaging Standard

Scope

Issue 7 of the GFSI Benchmarking Guideline introduced the terms 'food defence' and 'food fraud' for Packaging. This document clarifies the meaning of those terms for the Packaging Standard, and how they are to be applied to the manufacture of packaging and packaging materials.

Change log

Issue no.	Date	Description
1	May 2017	First Issue
<u>2</u>	<u>December 2017</u>	<u>Clarification on the need for sites to have a plan to manage food defence and food fraud hazards.</u> <u>Implementation of non-conformities.</u>

Introduction

'Food defence' and 'food fraud' are phrases used by the Global Food Safety Initiative (GFSI) benchmarking document Issue 7 with specific regard to Packaging materials, recognising that packaging has a significant role in maintaining product integrity throughout the supply chain.

This document seeks to discuss the meaning of 'food defence' and 'food fraud' and their implications and likely manifestations within packaging material manufacturers, and make it clear that these requirements mean packaging manufacturers shall have a plan in each case to manage any identified risks.

Hygiene level – high and basic

This paper applies equally to the high and basic hygiene categories. Although some materials will not come into direct contact with food, the integrity of the raw materials, the information carried on the packaging, and of the packaging material before it's used is vital to ensure product safety and legality further down the supply chain.

Food Defence

Definition used in the BRC Global Standard for Food Safety

"Procedures adopted to assure the safety of raw materials and products from malicious contamination or theft."

Definition used in GFSI benchmarking Issue 7

"The process to ensure the security of food and drink from all forms of intentional malicious attack including ideologically motivated attack leading to contamination."

Application in the packaging industry

A risk assessment approach should be used by the packaging manufacturer to establish if there is potential for any of the below. This risk assessment may require the site to look beyond their own process, to their suppliers, and could potentially result in risk assessments around suppliers' suppliers.

Ultimately, the aim is to identify potential hazards and take steps to mitigate the risk. Sites might choose to include this as part of their Hazard and Risk Management System, in line with section 2.2 of the Standard, or conduct the activity separately. Control measures are not specified here, but the site should determine what is appropriate, and when. Longer supply chains, where raw materials are shipped in from other countries, for example, might exacerbate the potential for the hazards to occur, either intentionally or not, so measures should be mindful of this.

Potential hazards include:

- Contamination of intermediate or finished packaging materials through malicious intervention, i.e. placing of contaminants at the packaging manufacturer.
- Contamination of raw materials through malicious intervention, i.e. contamination of raw materials prior to the raw materials arriving on site.

Clauses of particular interest in Issue 5.

- 2.2 – Hazard and risk analysis
- 3.1 – Product safety and quality management system

- 4.4 – Site security
- 6.1 – Training and competence

Therefore, the site’s assessment of their security arrangements shall result in a plan to manage the hazards identified. This will include:

- The identification of processes and procedures to reduce the risk
- Implementation of the identified processes or procedures
- Monitoring where applicable the processes to ensure these are effectively applied
- Corrective and preventative actions where monitoring indicates failure
- Annual review of the arrangements (plan) for effectiveness.

Food Fraud

Definition used in the BRC Global Standard for Food Safety

“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.”

Definition used in GFSI benchmarking Issue 7

“A collective term encompassing the deliberate and intentional substitution, addition, tampering or misrepresentation of food, food ingredients or food packaging, labelling, product information or false or misleading statements made about a product for economic gain that could impact consumer health.”

Application in the packaging industry

Again, a risk assessment approach will help sites in determining if there is opportunity in their supply chain, raw materials management and processes for fraudulent activity to take place.

Potential sources of fraud for the packaging manufacturer include:

- Fraudulent raw materials, e.g. non-FSC board/pulp sources in place of FSC board.
- Downgrading or substituted product, e.g. selling recycled board as virgin.
- Packaging which has been bought by non-genuine people, e.g. buyer purporting to be from a brand owner.

The potential hazards affecting brand owners that packaging manufacturers can help to mitigate include:

- Genuine packaging which is misappropriated for fraudulent products, where excess printed packaging has been illegally obtained and is essentially indistinguishable from genuine products.
- Fraudulent packaging which has been printed with genuine branding/artworks, where the brand logo has been obtained and is being used on fraudulent products.
- Misrepresentation of the retailed product, i.e. fraudulent packaging and a fraudulent product retailed as a genuine product.

Two of these three points can be affected by the packaging manufacturer. For example, if the management of excess printed packaging materials is effective, ensuring that it is not possible for these types of materials to be used, then the risk of this scenario is reduced.

Similarly, where the site has proper control of logos and branding that has been given to them in order to print or decorate packaging materials, the likelihood that these can be obtained and mis-used by unauthorised parties.

Requirements in 4.10 – Waste and waste disposal, 5.2 – Graphic design and artwork control, 5.3 – Packaging print control, and 5.7 – Control of non-conforming product are all relevant as they contain requirements outlining the site’s responsibilities with regards to management of digital data, such as logos, control of printing plates and other decoration media, and management of excess materials and non-conforming (but useable) materials. This is not just with regards to physical items, digital security is crucial so sites should be investigating their systems vulnerabilities.

When auditing these clauses, BRC expectation is that the assessment shall result in a plan to manage the identified hazards associated with raw materials or groups of materials. This will include:

- The identification of the measures to reduce the risk
- Implementation of the identified processes to manage the risk
- Testing and assurance processes (monitoring) where applicable is effectively applied
- Corrective and preventative actions where testing or checks indicates failure
- Annual review of the assessment (plan) for effectiveness.

These changes should be included as part of audits from the date of issue of this document. However, it is not expected that non-conformities shall be raised until July 1st 2018.

US FDA – Food Safety Modernisation Act (FSMA)

In some regions, FSMA will have prompted food manufacturers and handlers to assess their supply chains for potential vulnerabilities that would cause a food safety hazard, and those supply chains inevitably extend beyond the US. Therefore, packaging manufacturers outside of the US may have been asked questions about their process and supply chains which will assist their customers in evidencing compliance with FSMA.

There is currently no overt mention of packaging materials within the FSMA legislation, but it’s not unlikely that packaging will be deemed a raw material and will need to be assessed in the same way as any other raw material.



Appendix 1 – GFSI Issue 7, Requirements for schemes.

GFSI Clause name	Requirement	BRC Clause
Food defence threat assessment	The standard shall require that the organisation have a documented food defence threat assessment procedure in place to identify potential threats and prioritise food defence measures.	4.4
Food defence plan	The standard shall require that the organisation has a documented plan in place that specifies the measures the organisation has implemented to mitigate the public health risks from any identified food defence threats.	2.2 4.4
Food defence plan	The standard shall require that the organization's Food defence plan and shall be supported by the organisation's Food Safety Management System.	2.2 4.4 3.1
Food fraud vulnerability assessment	The standard shall require that the organisation has a documented fraud vulnerability assessment procedure in place to identify potential vulnerability and prioritise fraud mitigation measures.	2.2 4.4
Food fraud mitigation plan	The standard shall require that the organisation has a documented plan in place that specifies the measures the organisation has implemented to mitigate the public health risks from the identified fraud vulnerabilities.	2.2 4.4
Food fraud mitigation plan	The standard shall require that the organization's fraud mitigation plan and shall be supported by the organisation's Food Safety Management System.	2.2 4.4 3.1