Managing the Verification of Food Authenticity and Integrity

Assuring food authenticity and integrity - protecting the food sector from threats and vulnerabilities

A Seafish/REHIS Joint Award

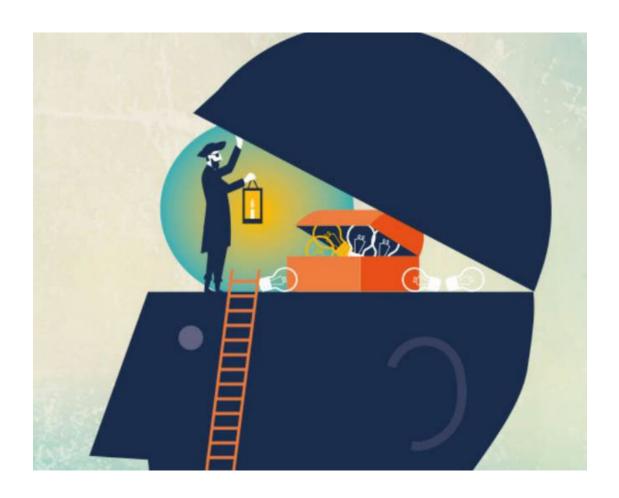
Andrew MacLeod BSc (hons) BSc. Pg Dip (Food Safety) CSci (Food Sci & Tech) FIFST FS Prin (IFST)

Date





Introductions



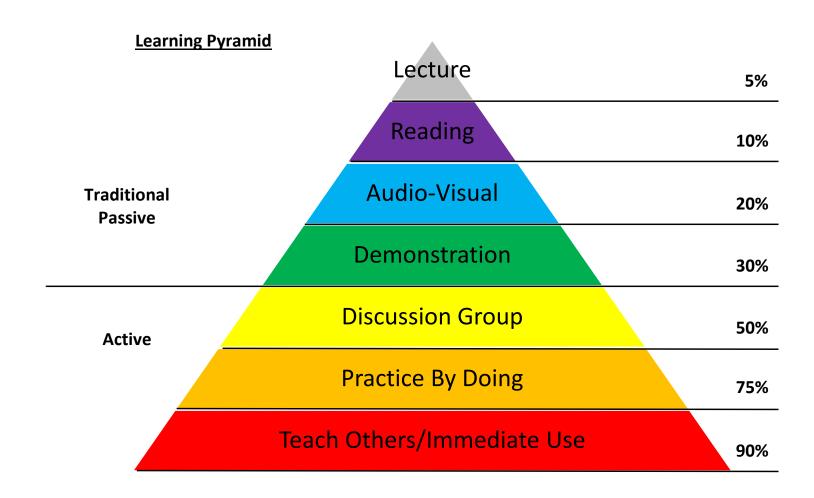


Summary overview





The learning pyramid





Course relationships





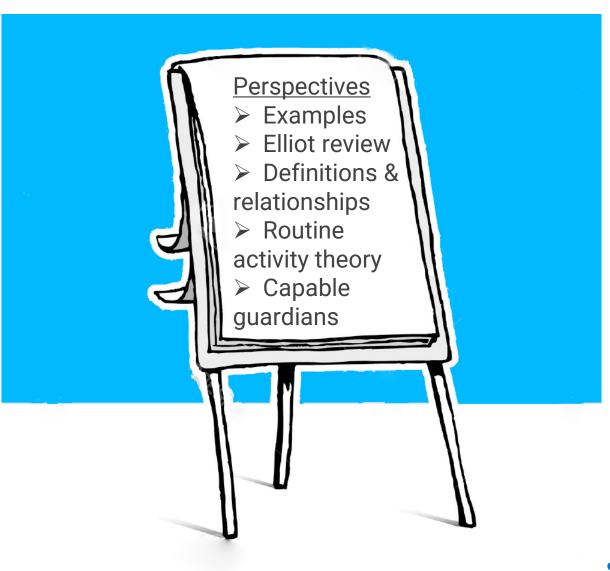








Perspectives overview





Food Authenticity

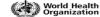
"The quality of a food to be genuine and undisputed in its nature, origin, identity, and claims, and to meet expected properties"

Food Integrity

"The status of a food product where it is authentic and not altered or modified with respect to expected characteristics including, safety, quality, and nutrition"

CODEX ALIMENTARIUS COMMISSION





CX/FICS 18/24/7

JOINT FAOWHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty- Fourth Session Brisbane, Australia, 22 - 26October 2018

DISCUSSION PAPER ON FOOD INTEGRITY AND FOOD AUTHENTICITY

Food Fraud

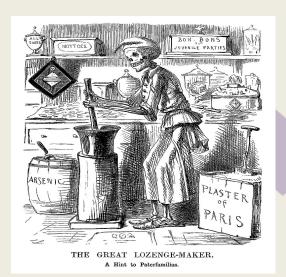
"Any deliberate action of businesses or individuals to deceive others in regards to the integrity of food to gain undue advantage. Types of food fraud include but not limited to: adulteration, substitution, dilution, tampering, simulation, counterfeiting, and misrepresentation"

Economically Motivated Adulteration

"is a subset of food fraud. It is the intentional substitution or addition of a substance in a product for the purpose of increasing the apparent value of the product or reducing the cost of its production, for economic gain".



Dying for a sweet? -The 'Bradford and Punjabi' sweet incidents







Nature, substance and quality

- S14 FSA offence to sell to the purchaser's prejudice food not of:
 - Nature ('Difference') Riley Bros (Halifax) Ltd vs (Hallimond)
 (19270 44 TLR 238 Butter toffee containing coconut fat. Held butter toffee. Implied only butterfat.
 - Substance ('Compatible with the demand'). Hall v Owen Jones &
 Jones (1967) ALL ER 209 Penicillin in milk.
 - Quality ('Commercial Quality including description"). Goldrup v John Manson Ltd [1981] 3 All ER 257 S 2 FDA 1955 (s 14(1) FSA) Re fat in minced beef.
 - 1) purchaser's "demand" depends on express contractual terms or on what is inferred from all surrounding circumstances
 - 2) quality demanded is that of the purchaser not of the analyst
 - 3) quality demanded, where displayed on a notice, is the quality so declared
 - 4) de minimis deficiency in quality is not to the purchaser's prejudice
- Disjunctive
- Well established longstanding provisions of Food Law





Falsely advertising/describing/presenting food etc

- S15 FSA S14 FSA Offence to :
- Falsely Describe e.g. Port not Portuguese provenance Sandeman v Gold (1924) 1 KB 107
 - Includes omissions R vs Kyslant (1932) 1 KB 442, Re share prospectuses – an analogous law provision
- Likely to mislead Arlidge vs Blue Cap Foods (Kent) ltd (1965) 63 LGR 167 - re fully prepared sliced selected tins of apples 25% solids lost & added water
- Derived well established longstanding provisions of Food Law





Sudan dye incidents



RECALLED

Pak. J. Biochem. Mol. Biol. 2016; 49(1): 29-35

Review

SUDAN DYES AND THEIR POTENTIAL HEALTH EFFECTS

*1 Alim-un-Nisa, 2 Naseem Zahra, 3 Yasha Nazir Butt

1, 2 Food and Biotechnology Research Centre (FBRC)

PCSIR Laboratories Complex, Ferozepur Road Lahore-54600, Pakistan

3 Institute of Biochemistry and Biotechnology, University of the Punjab, Lahore.

Abstract: Sudan dyes are synthetic, oil-soluble, red coloured azo dyes which are not permitted by the authorities in Switzerland, Japan, Europe, and the United States for the purpose of food colouring. Sudan dyes I, II, III, IV, and their degradation products are considered harmful to human health due to their teratogenicity, genotoxicity, and carcinogenicity which leads to cancer. Many experimental studies on animal specimen have confirmed the formation of tumour due to the presence of different Sudan dyes in food products. Sudan dyes are described to have sensitising characteristics; they easily get absorbed through dermal route and airways and causes health problems. This paper discusses the harmful effects of Sudan dyes on human health which is now greatly used in foodstuffs.

Keywords: Sudan dyes, Illegal, Health effects

Received: January 11, 2016 Accepted: February 15, 2016 *Author for Correspondence: nisaalim64@yahoo.com



Melamine in milk







Operation Tacanna and scallop fraud

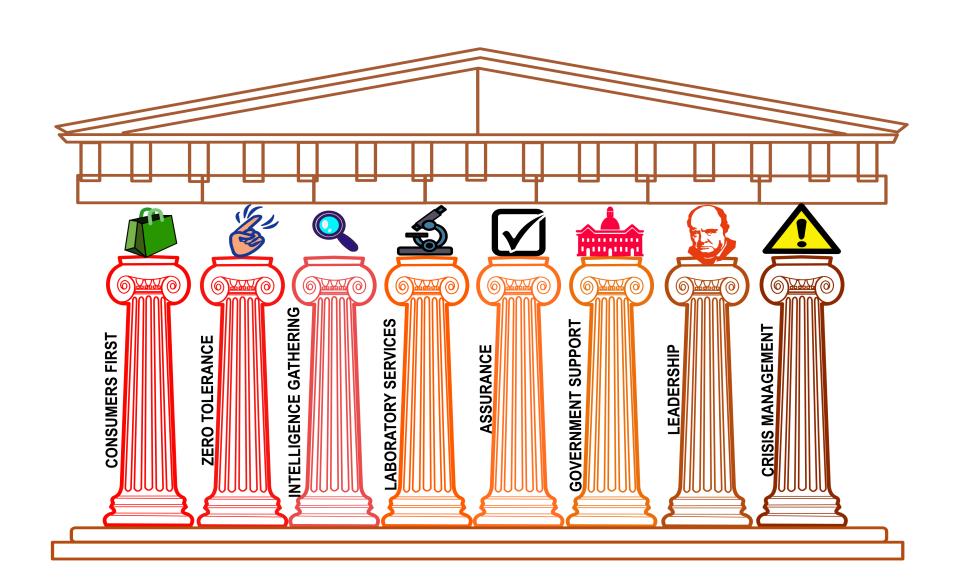














Micro

Internal scope, manufacturing establishment

Meso

Internal scope, company culture etc

Macro

External scope, supply chain/society etc



Typology of food fraud

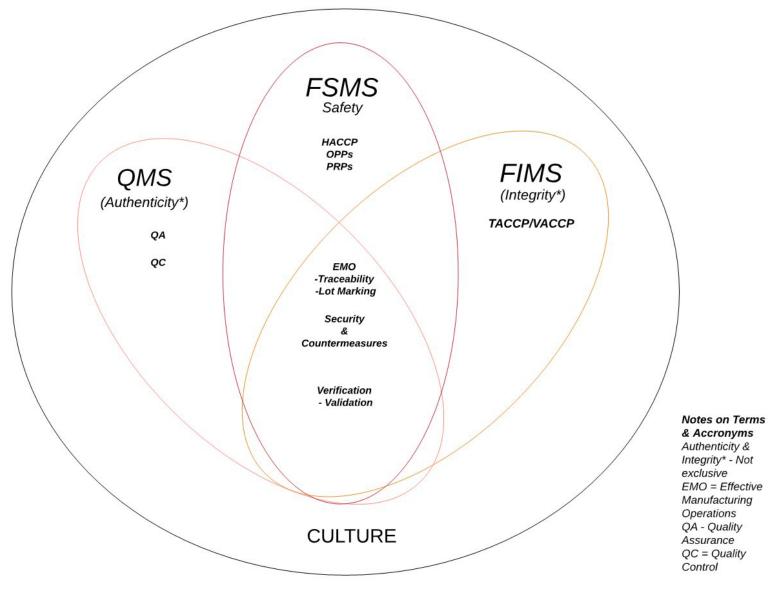
GFSI (1) type of food fraud	Definition from SSAFE (2)	Examples from GFSI FFTT (3)	General type of food fraud
Dilution	The process of mixing a liquid ingredient with high value with aliquid of lower value	 Watered down products using non-potable / unsafewater Olive oil diluted with potentially toxic tea tree oil 	Adulterant- substance (adulterant)
Substitution	The process of replacing an ingredient or part of the product of high value with another ingredient or part of the product of lower value	 Sunflower oil partially substituted with mineral oil Hydrolyzed leather protein inmilk 	Adulterant- substance or tampering
Concealment	The process of hiding the low quality of a food ingredients or product	 Poultry injected with hormones to conceal disease Harmful food colouring applied to fresh fruit to cover defects 	Adulterant- substance or tampering
Unapproved enhancements	The process of adding unknown and undeclared materials to food products in order to enhance their quality attributes	 Melamine added to enhanceprotein value Use of unauthorized additives (Sudan dyes in spices) 	Adulterant- substance or tampering
Mislabelling/ misbranding	The process of placing false claims on packaging for economic gain	 Expiry, provenance (unsafe origin) Toxic Japanese star anise labelled as Chinese star anise Mislabelled recycled cookingoil 	Tampering
Grey market production/ theft/diversion	Outside scope of SSAFE tool	 Sale of excess unreported product, Product allocated for the US market appearing in Korea 	Over-run, theft or diversion (4)
Counterfeiting (IPR)	The process of copying the brand name, packaging concept, recipe, processing method etc. of food products for economic gain	 Copies of popular foods notproduced with acceptable safety assurances Counterfeit chocolate bars 	Counterfeiting (IPR)

Acronyms, explanations & attribution:

GFSI – Global Food Safety Initiative, SSAFE – Safe Secure and Affordable Food For Everyone, GFSI FFTT – Global Food Safety Initiative: Food Fraud Think Tank
Gray Market – a market employing irregular but not illegal methods; Theft – something stolen; Diversion/Parallel Trade – the act or an instance of diverting straying from a course, activity, or use. Adapted from (Spink and Moyer 2011, Spink 2013, SSAFE Organization 2015, PWC Price Waterhouse Cooper 2016, GFSI 2017, Spink, Ortega et al. 2017)



Scope of verification



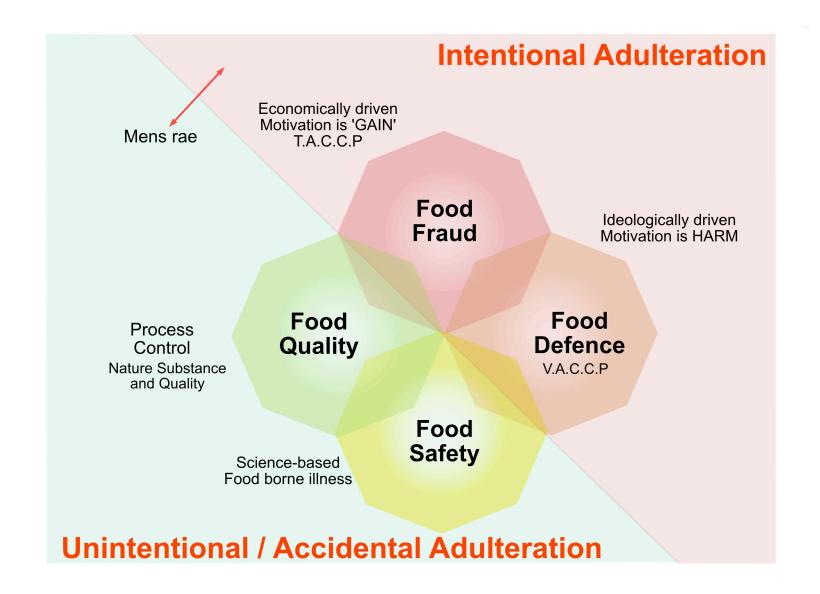


Is there a vulnerability/threat relevant at this step/location/activity? – Apply to all questions Usually only relevant at Dilution? Relevant vulnerability map Yes purchase/receipt (exception No 🔰 allergens) Subtraction? Relevant vulnerability map Yes No ¬ Relevant vulnerability map Concealment? Yes No ¬ Relevant vulnerability map Addition? Yes No -Mis-labelling/mis-representation? Yes Relevant vulnerability map No 🚽 Yes Relevant vulnerability map Counter-fitting/diversion? No 🔻 Vulnerability not relevant at step/location/activity Repeat for each step/location/activity

Food crime:-Mens Rae and Malice aforethought

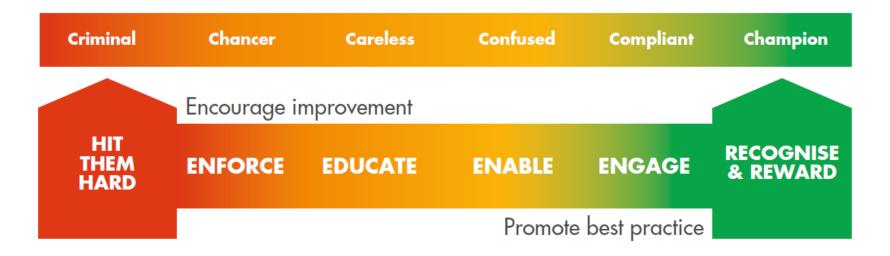








An enforcement spectrum





Routine activity theory



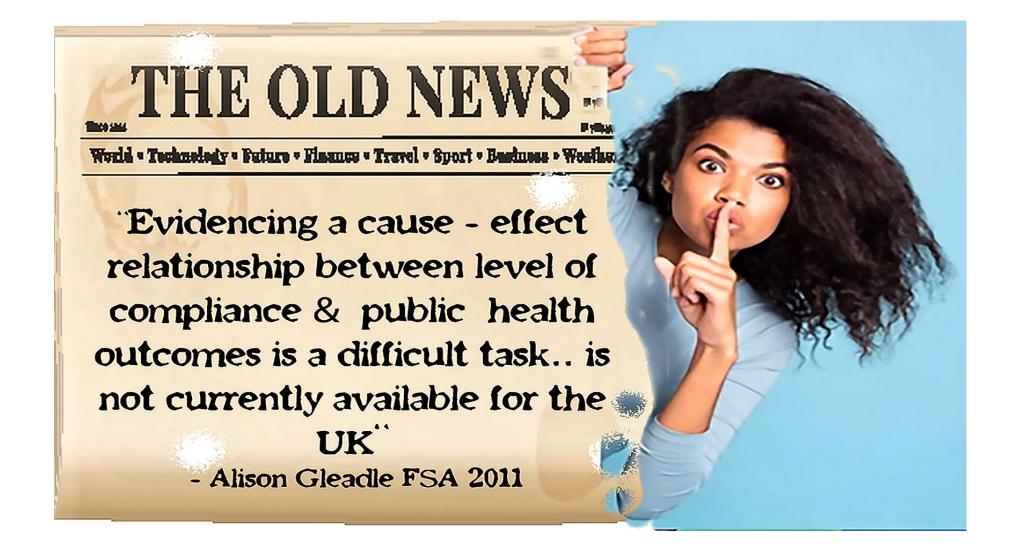
PAS 96:2017 Guide to protecting and defending food and drink from deliberate attack













Complexity and simplification





Literature review



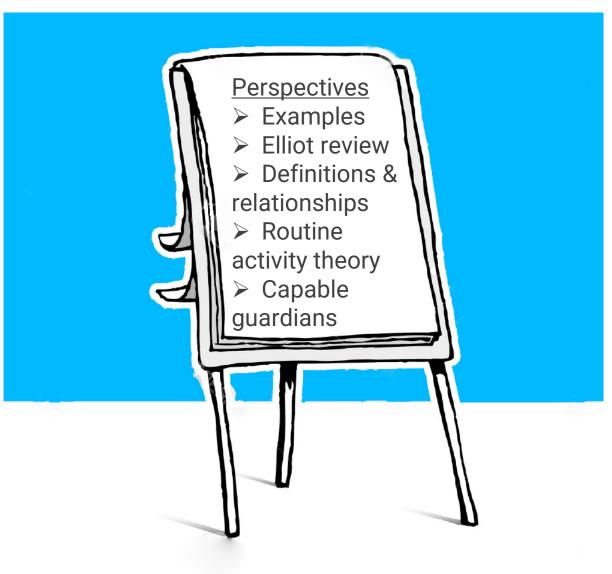


Capable guardians





Perspectives summary





FBOV FBOV/OCV

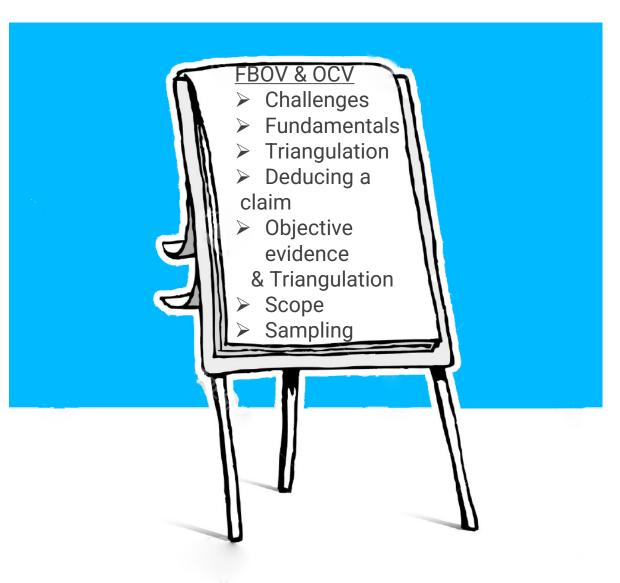




FBO Culture SPC Mass-Balances Traceability Authentication



Verification FBOV and OCV overview





EFFECTIVENESS CHALLENGE FBOVS AND OCVS MUST BE 'EFFECTIVE' (FROM FOOD LAW)-AND THE PURPOSE OF FOOD LAW (AND THEREFORE FBOVS AND OCVS) IS TO ENSURE THE FBO PROTECTS THE CONSUMER IN FOOD AUTHENTICITY, INTEGRITY AND IN SAFETY TERMS... Sharpie FINE

SCIENCE CHALLENGES

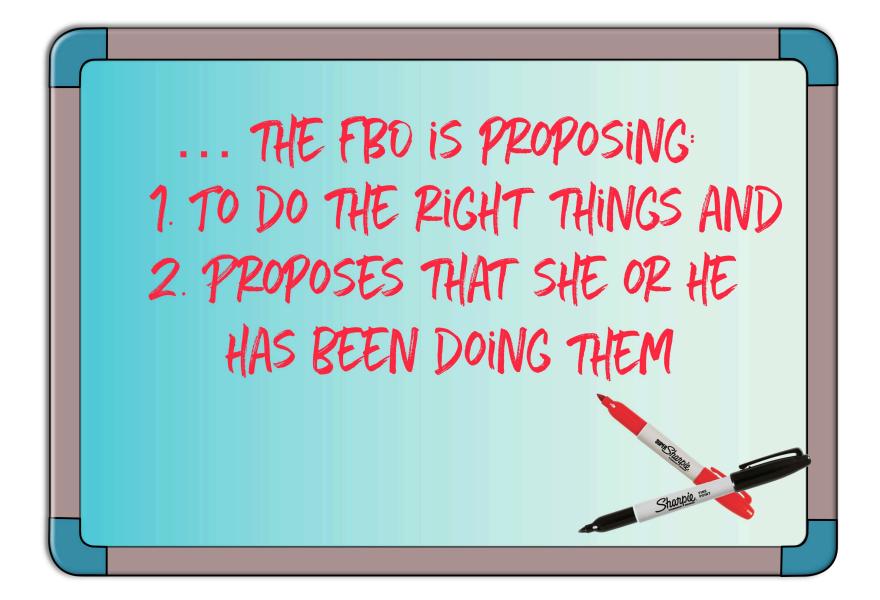
REG 178 ESTABLISHED THE SCIENTIFIC BASIS OF FOOD LAW THEREFORE -EMPIRICISM - OBJECTIVE EVIDENCE AND MEASUREMENT



PROPOSITIONS CHALLENGE

MARKET - WE CAN DEDUCE THAT
THE FBO PROPOSES THAT IT IS
AUTHENTIC AND IT IS SAFE







... BY SIMPLE DEDUCTION OUR APPROACH TO VERIFICATION CAN THEREFORE BE DEDUCED, I.E VERIFY 1. DOES THE FBO INTEND TO DO THE RIGHT THINGS AND 2. IS THE FBO DOING THOSE THINGS?



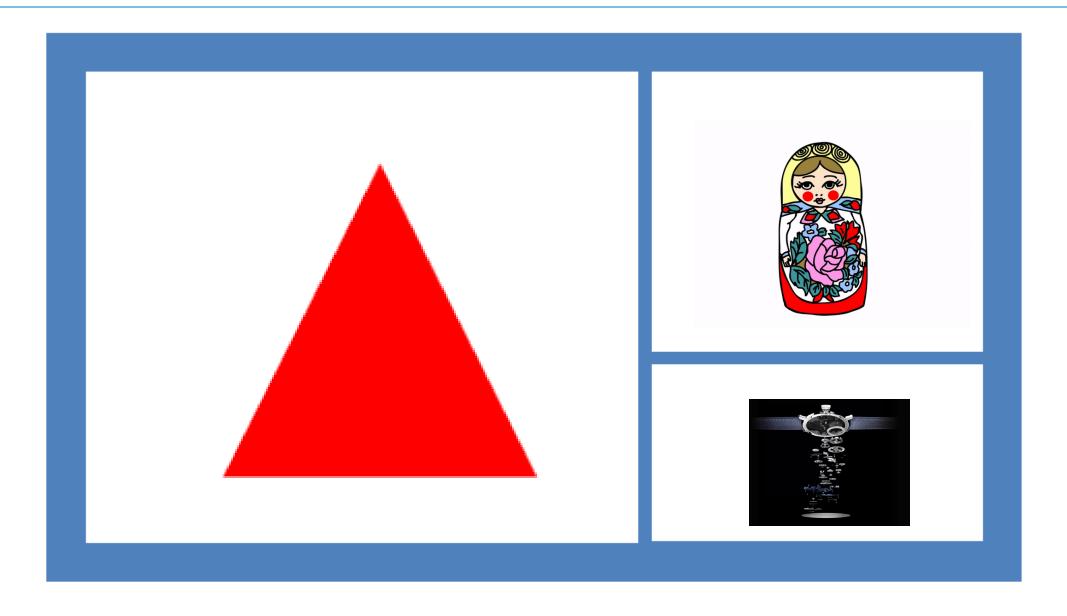
FROM FBO
PROPOSITIONS
AS A PRIORITY
WE CAN DEDUCE
3 CARDINAL
POINTS OF
REFERENCE ...

VERIFIER
PROPOSITION

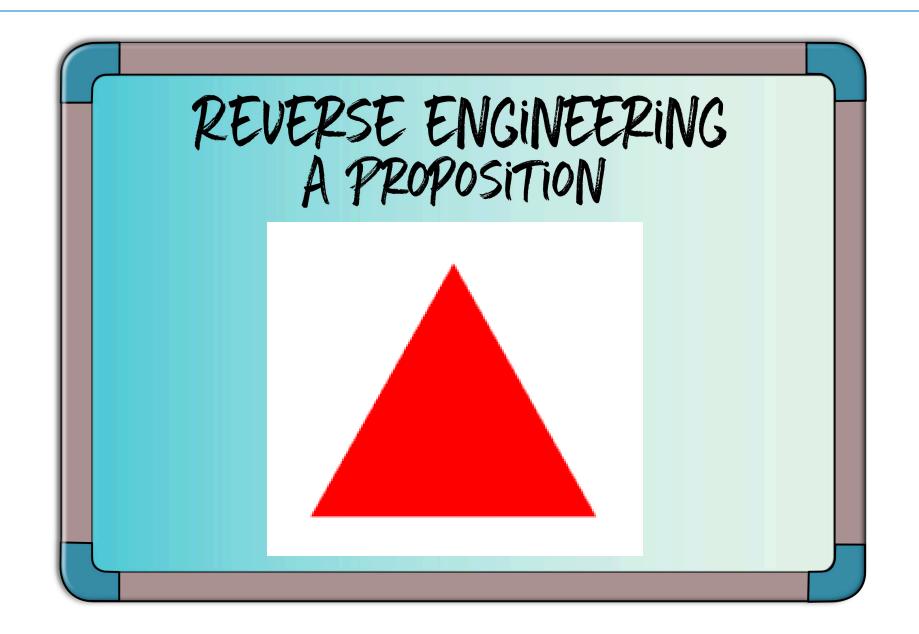
PROPOSITION V

FBO IMPLEMENTATION (REALITY CHECK)

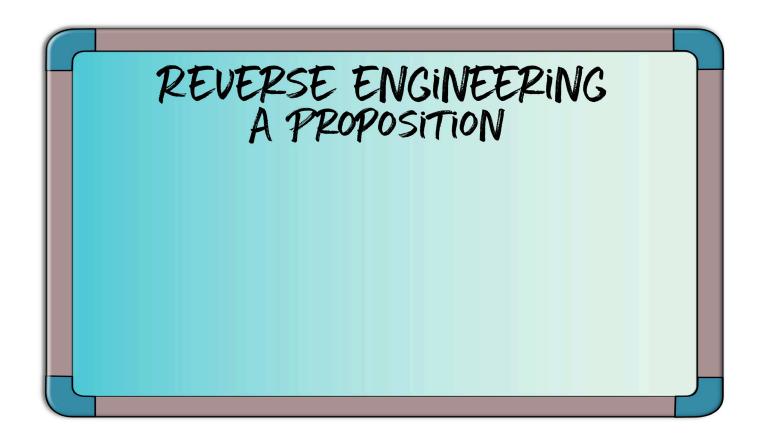








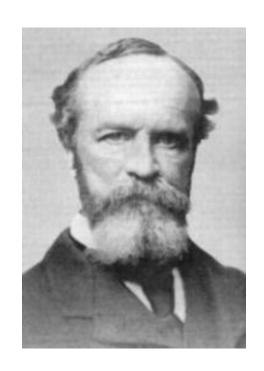
Exercise – reverse engineering the FBO's proposition





Objective evidence

- "Objective evidence and certitude are doubtless very fine ideals to play with, but where on this moonlit and dream-visited planet are they found?"
- William James 1842 –1910 (considered to be one of the greatest philosophers of the pragmatic school)
- "Information that can be proved true, based upon facts obtained through observation, measurement test or other means"
- First defined BS EN 8402/1995
- Referred Regulation (EC) 178/2004 but not defined





Attributes of objective evidence

- Scientific Can the data be evaluated by independent observers to reach the same conclusions?
- Scientific Are the data documented in a manner to allow re-creation of the data or the events described?
- Scientific Does the documented evidence provide sufficient data to prove what happened, when, by whom, how, and why?
- Legal Was the documentation completed concurrent with the tasks?
- Legal Is the documentation attributable?

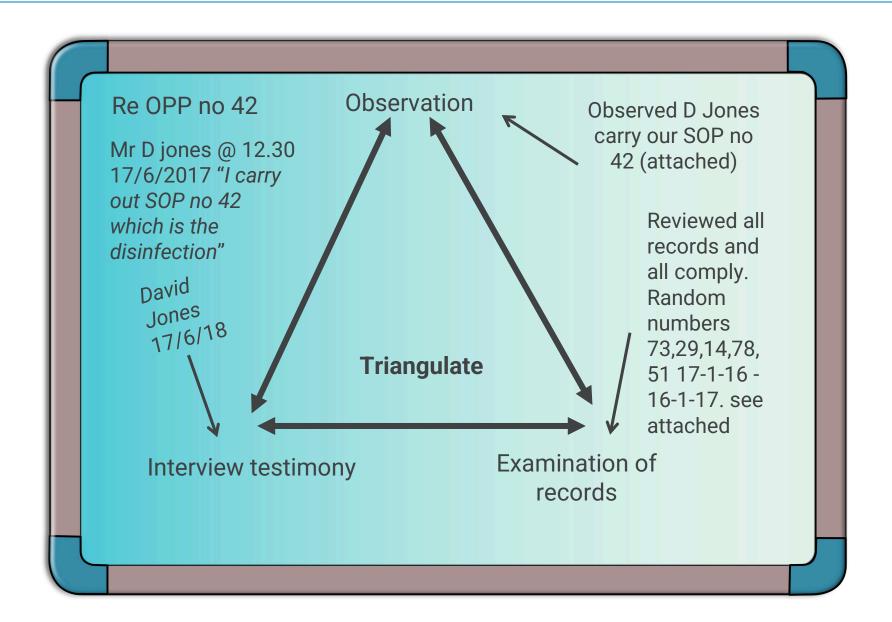




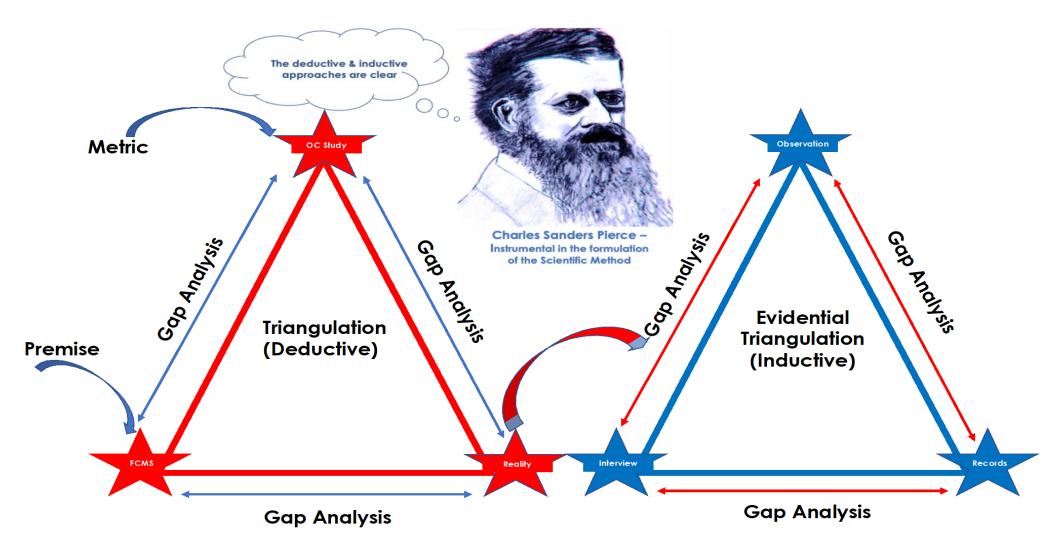


Denise Dion
USA FDA Office of
Regulatory Affairs,
Primary editor of
the FDA
Investigations
Operations
manual

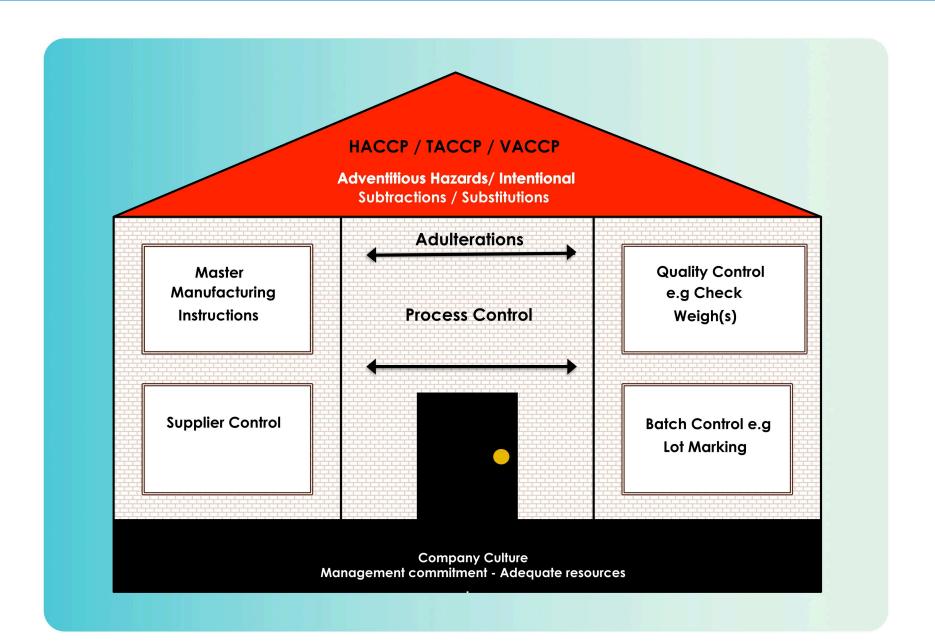




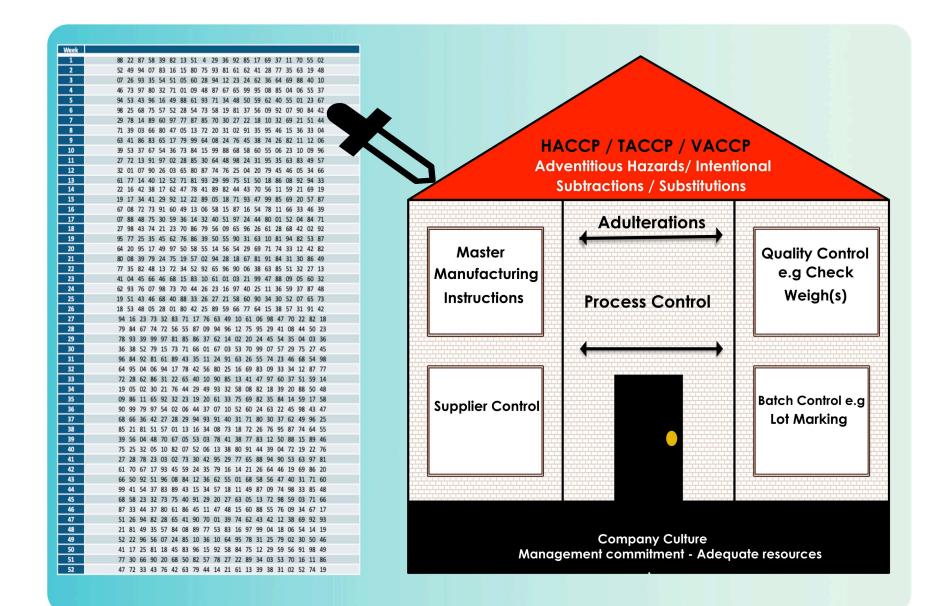
Relationship to science







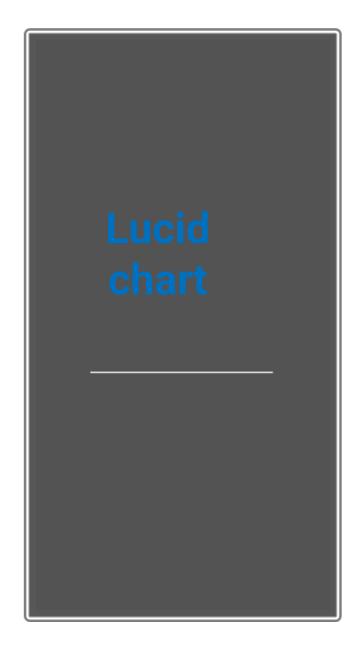


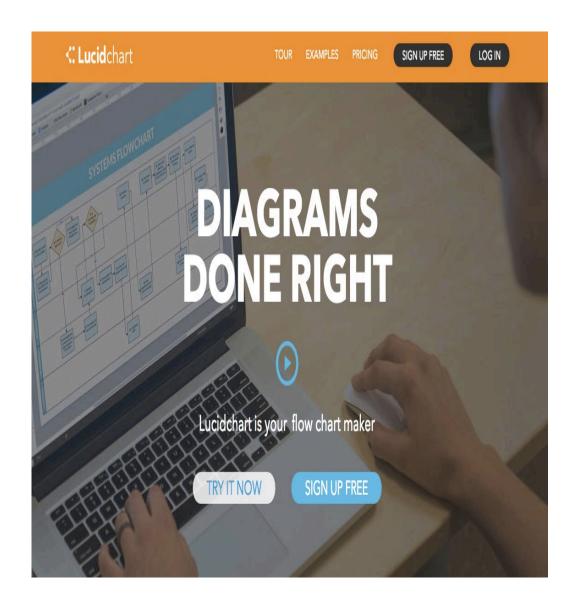






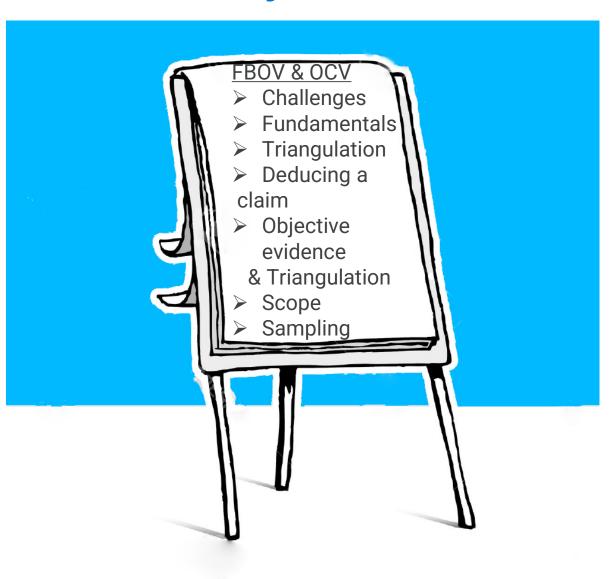






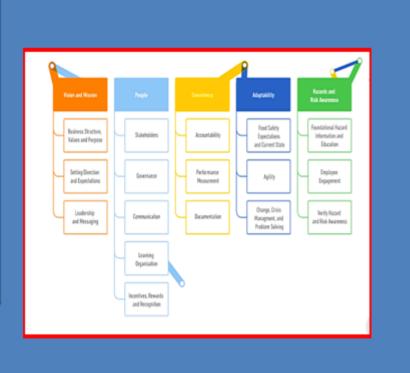


Verification FBOV and OCV summary



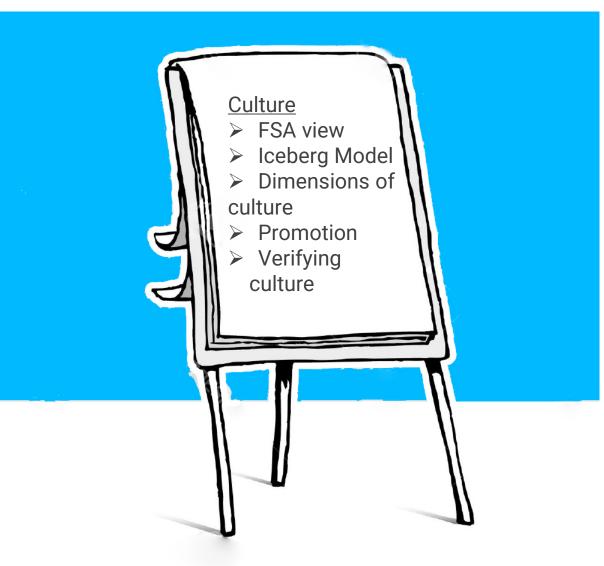


Company Culture



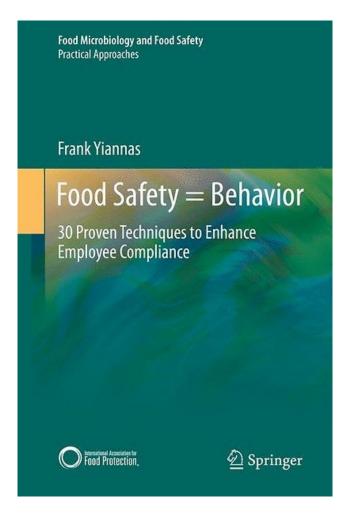


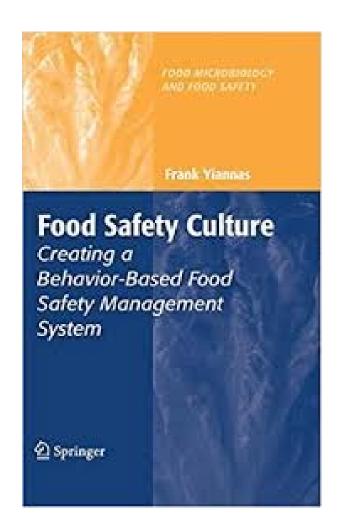
Company culture overview

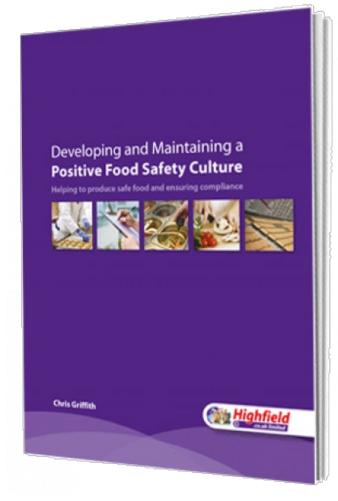




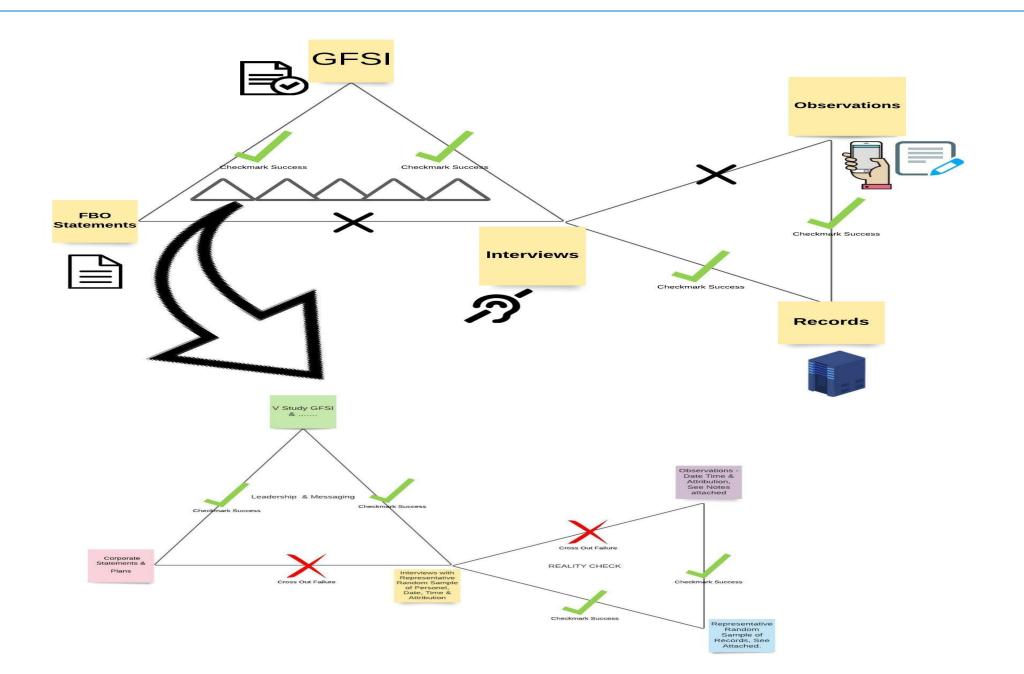
Sources





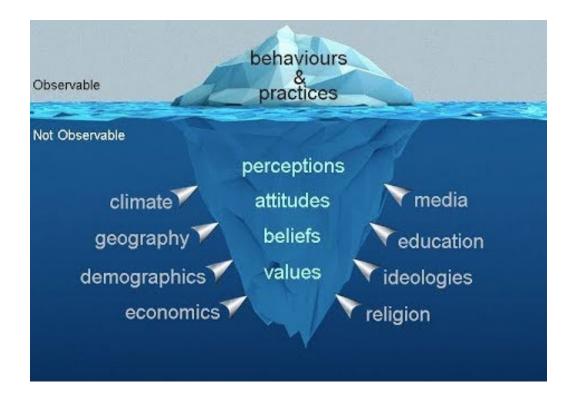






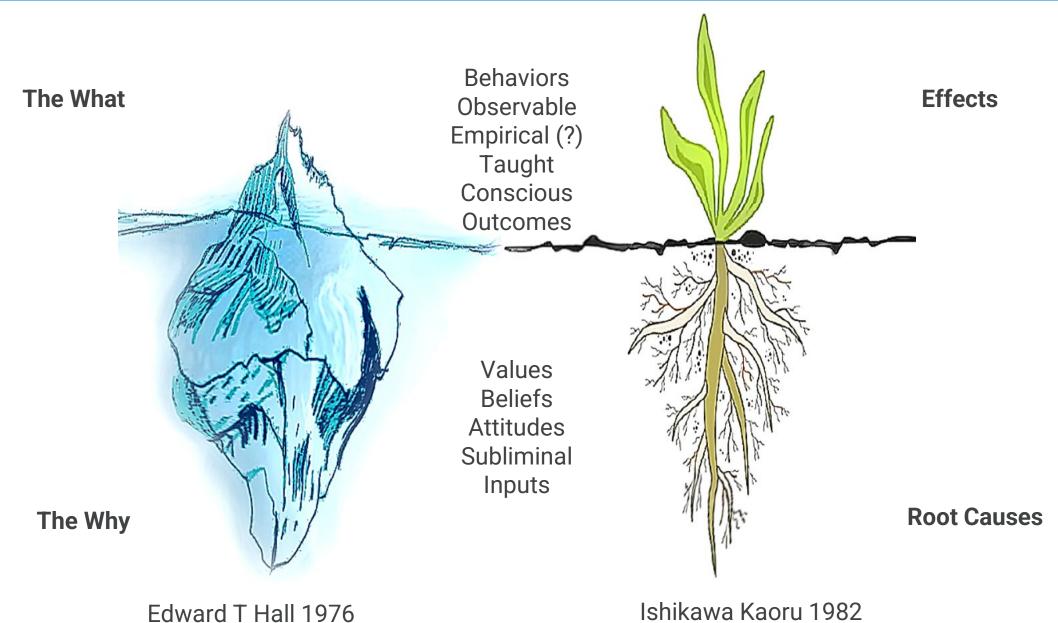


The Iceberg Model



 "Shared values, beliefs and norms that effect mind-set and behaviour toward Food Safety in, across and throughout an organization." GFSI 2018







FBO culture

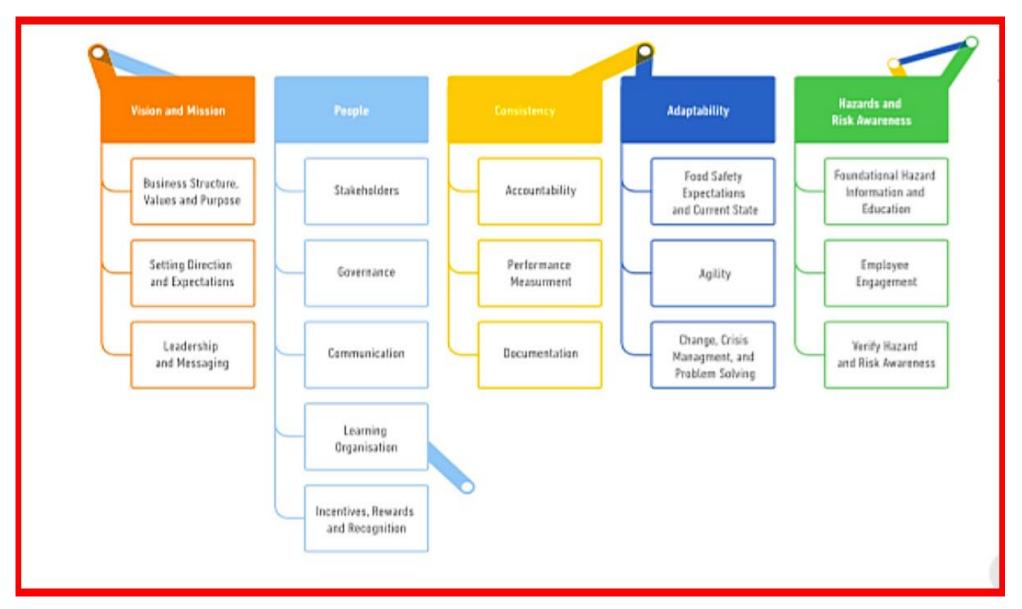
"Creating a culture in which all staff are both able and confident to report suspicions of wrongdoing is vital. Businesses can do this by ensuring they provide an environment in which staff are able to see the moral as well as the commercial benefits of identifying wrongdoing, whether within or outside of their business. Working with the National Food Crime Unit, whether by sharing fraud concerns or by finding new ways to design out fraud, will make the UK food sector both a safer and a more economically prosperous place, benefitting both businesses and consumers alike"

Andy Morling Head of FSA Food Crime Unit 2016





Five dimensions of food culture





Verifying FBO culture





Food safety culture diagnostic toolkit for inspectors

@Food Standards Agency, 2012.

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This is a draft toolkit developed as part of an ongoing research project. The views expressed in this document are those of Greenstreet Berman Ltd and its contractors and not necessarily those of the Food Standards Agency.

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Authors: Michael S Wright, Paul Leach and Gill Palmer.



Verifying FBO culture



BRC CULTURE EXCELLENCE FOOD SAFETY CULTURE MODULE

SITE IMPLEMENTATION MANUAL









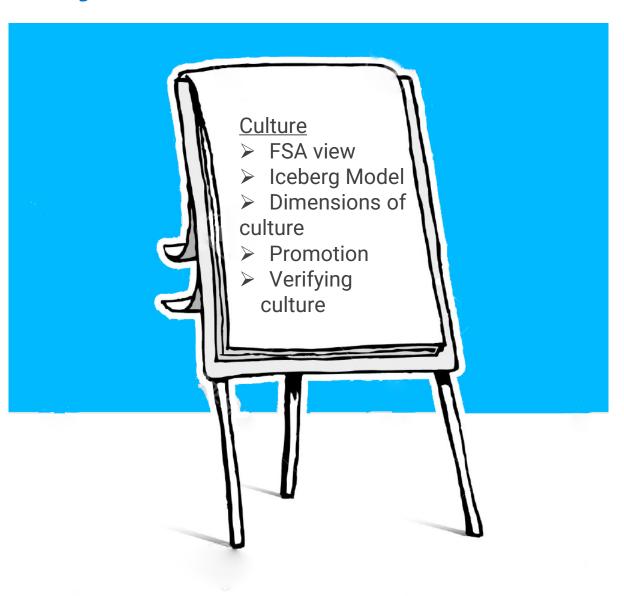


Discussion – promoting & verifying FBO food culture





Company culture summary





Traceability and Provenance



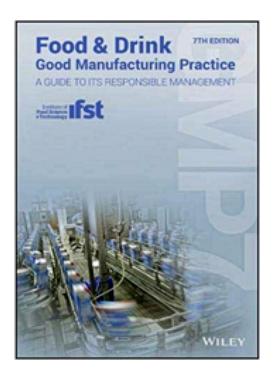


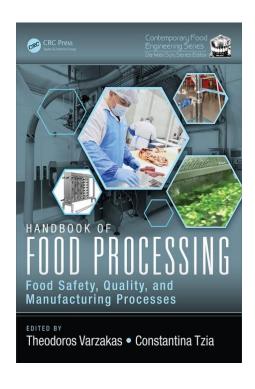
Traceability & provenance overview

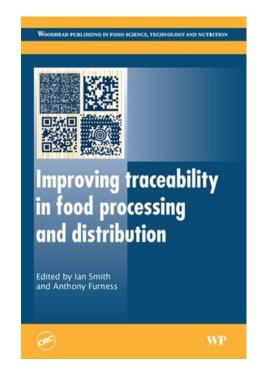


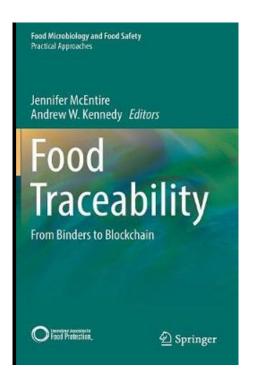


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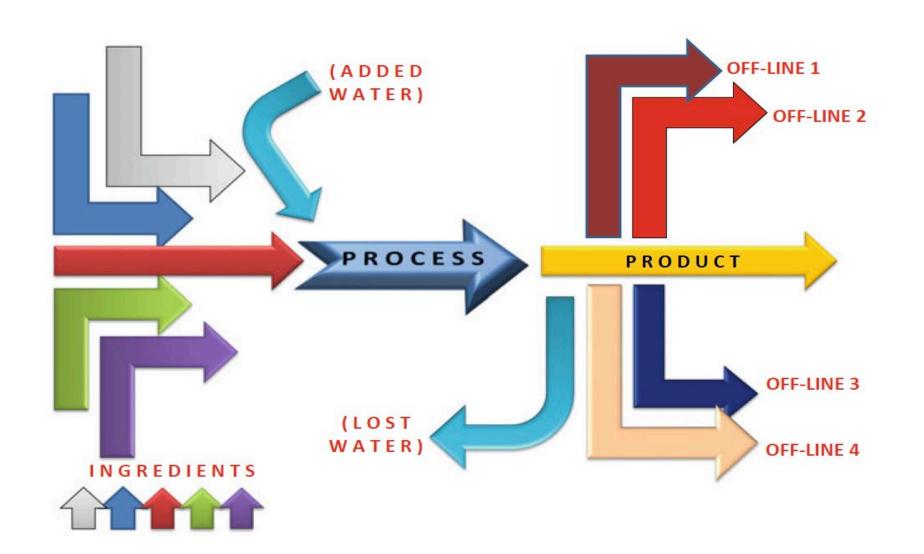






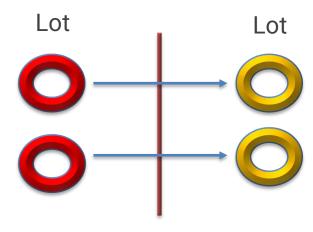








(a) Receiving lots



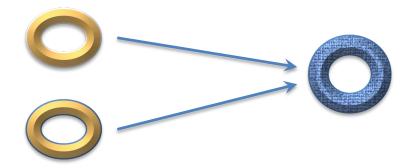
- Verify the incoming shipment and its information (labels/invoice etc.)
- Cross ref to supplier date and time
- Record info
- Where one step back FBO has not implemented traceability verify ID on incoming lot – follow G (see below)
- (b) In establishment movement where there is no processing



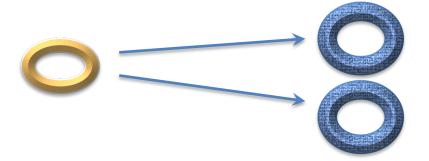
- Cross ref the lot with label and invoice
- Record date and time



(c) Combination of a lot



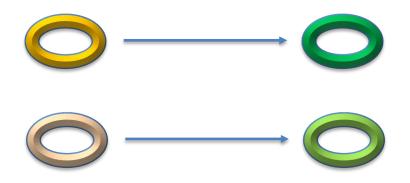
(d) Division of a lot



- Verify data re pre-combined lots, refer SOP and record
- Assign new ID to combined lot
- Link data before and after combination and record.
- Record info re combination work needed for ID if any (e.g., date, quantity before and after combination)
- Prepare label and invoice with the new ID and attach
- Verify pre-divided lot data and record
- Assign new lot ID to divided lots
- Record the ID linkages
- Record division data, e.g., quantities before and after division, date and time
- Prepare label and invoice with the new ID and attach

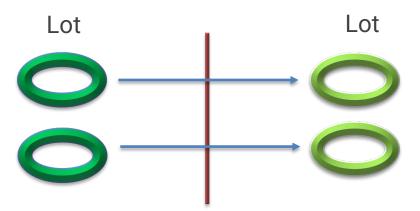


(e) Processing not involving Combination of lots e.g.., heating, freezing drying etc.



- Verify pre-processing lots data and record
- Record info re processing work required for ID If any e.g.., date and time of processing, quantities before & after processing
- Prepare label and invoice with ID of processed lot and attach

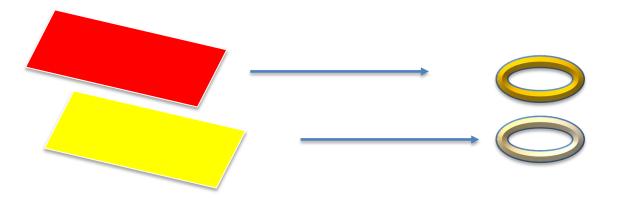
(f) Shipment of a lot



- Verify lot to be shipped and its data. Record
- Cross reference and link ID of shipped lot to buyer date and time. Record



(g) Formation of a lot (e.g.., obtaining from the farm (livestock and marine products) or when receiving no ID products not covered by the FCMS



- Decide on the product lot and assign ID
- For each lot record data required for ID e.g., (producer, farm date and time)

(h) Disposal of a lot



- Verify the product lot and its data prior to disposition. Record
- For each lot record the disposal date, time and place

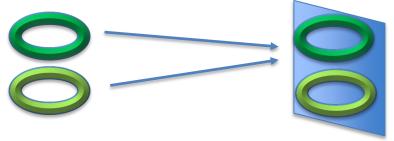


(i) Requirements for in-house IDs

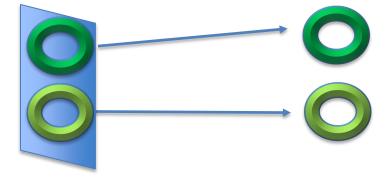


 FBO to set a rule re in-house ID, linked to incoming and outgoing lot IDs

(j) Grouping (forming) lots



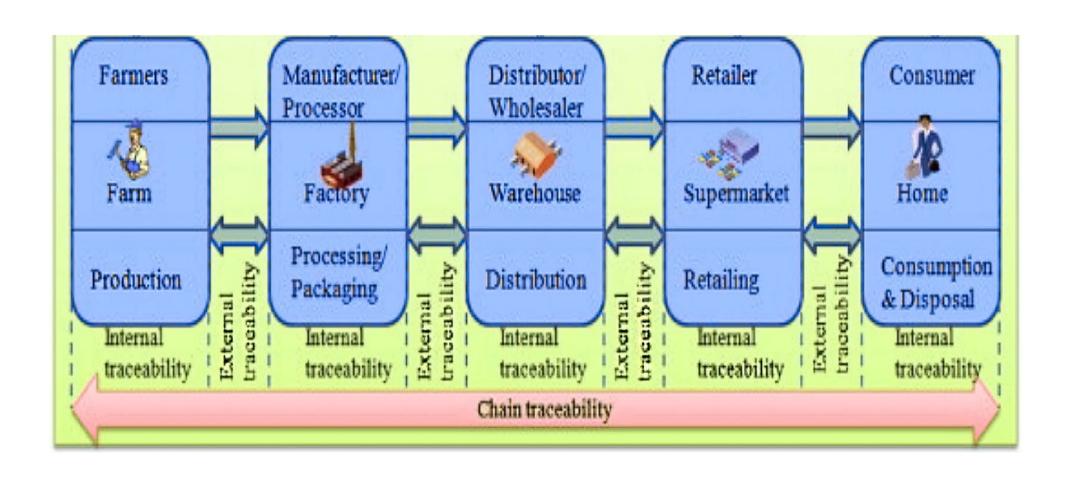
(k) Dividing Lots (e.g. a traceable unit)



- Assign a new ID to grouped lot
- Link to product ID before the grouping to after. Record
- Record info re grouping work if any e.g.., date, time place
- Link to product ID before the division to after. Record
- Record info re division work if any e.g., date, time, place



Traceability





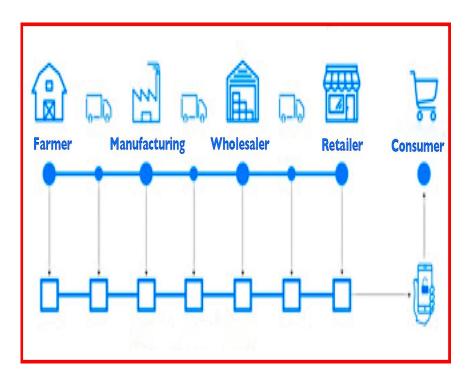
Traditional vs forensics

	Traditional	Forensics
Speed	X Can be slow relies on checking data & each point in the supply chain	✓ Fast 1 to 5 days
Accuracy	X Reliant on packaging - Fails when packaging lost or counterfeit	 ✓ Traces product not packaging ✓ Science & algorithmic methods Can't be counterfeited without detection
Farm to Fork	X Reliant on packaging – Does not reach critical point of consumption	✓ Actual product assayed Trace from consumer to farm
Scientific	X Paper based – Prone to error	 ✓ Peer reviewed scientific literature ✓ Accepted as evidence in court



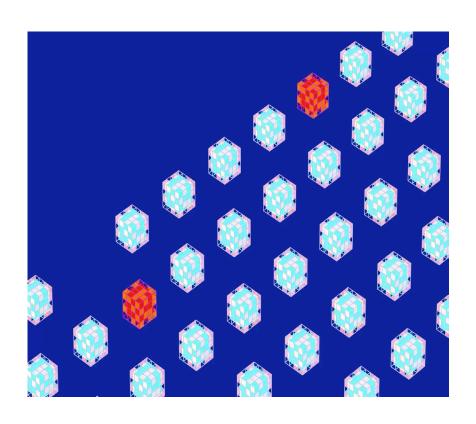
Blockchain







Blockchain





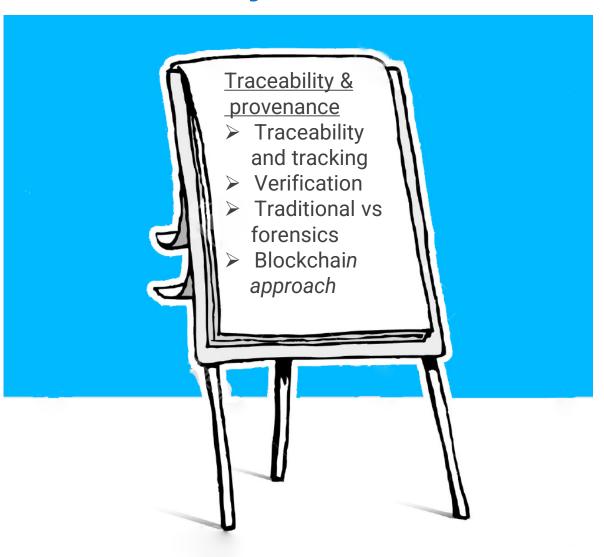


Discussion - traceability





Traceability & provenance summary

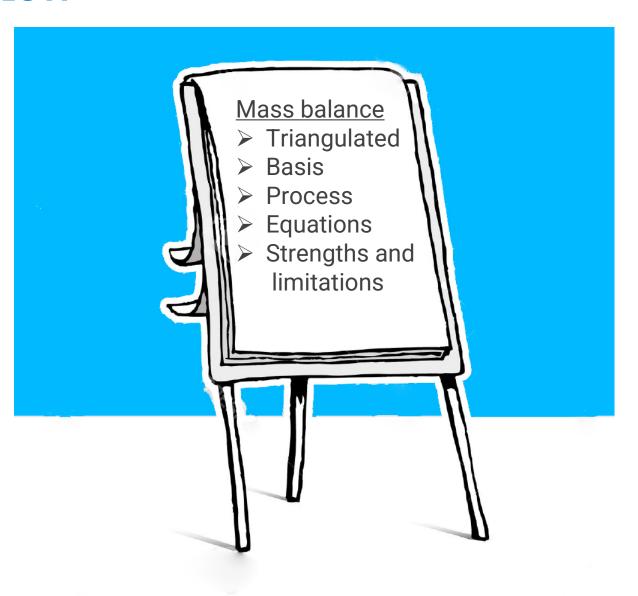




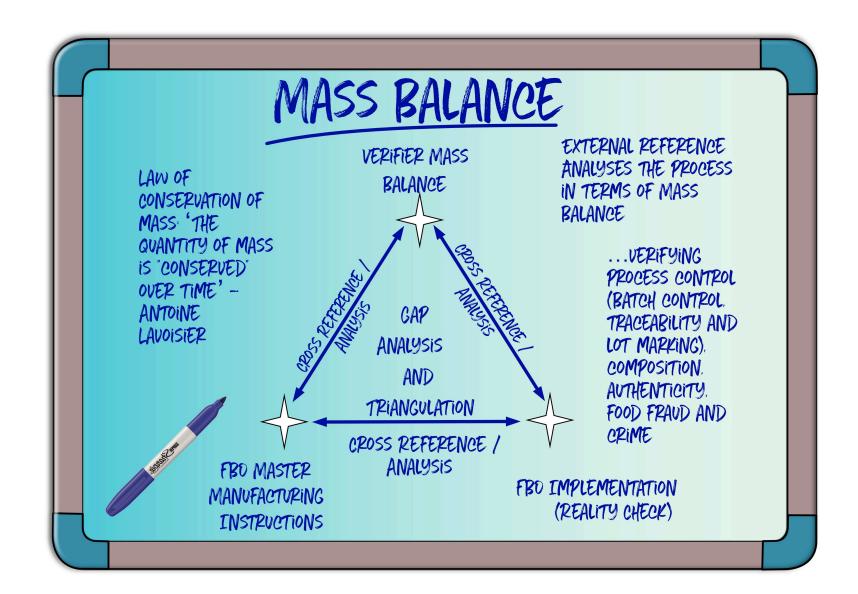




Mass balance overview

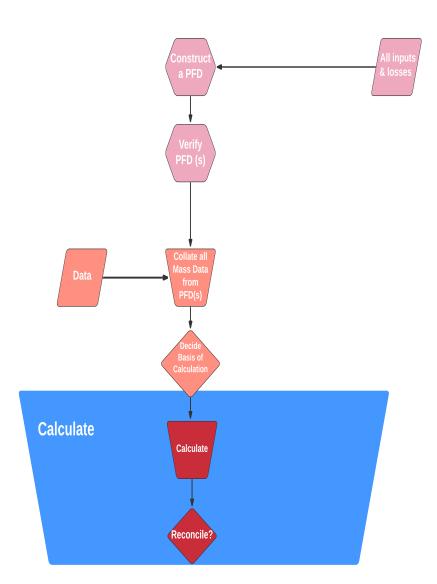








Mass balance process





EQUATIONS OF MASS BALANCE

$$m_{in} = m_{out}$$

Steady State Situation' – The most common situation e.g. batch process Where M_{in} and M_{out} are the total mass flow rates entering and leaving the system respectively

$$\dot{m}_{in} - \dot{m}_{out} = \frac{dm_{sys}}{dt}$$

Continuous Flow Situation' e.g. Milk pasteurisation with 'Just in Time' Distribution. Where dm_{sys}/dt is the rate of mass accumulation (or mass depletion) within a system at a specific point in Kg/s.

$$\sum_{i=1}^{K} \dot{m}_{i \ in} = \sum_{j=1}^{n} \dot{m}_{j \ out}$$

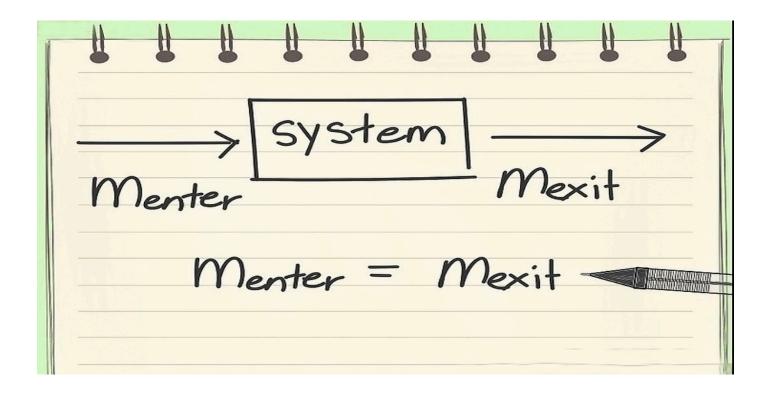
Multi Stream Situation. Where M_{i in} and M_{j out} are the flow rates of streams 'i' and 'j' entering and leaving the system respectively.

$$\sum_{i=1}^{K} X_{i} \dot{m}_{i \ in} = \sum_{j=1}^{n} X_{j} \dot{m}_{j \ out}$$

Chemical Reaction Situation:-Where X_i is the mass fraction of a specific component in the 'entering stream' 'i', and X_j is the mass fraction of the same component in the 'exiting stream' 'j'.



Steady state is most common





M_{in} = M_{out} : Milk_{in = cheese out + whey out} M_{in =} Incoming Milk = 455L Step 2 - CCP1 Milk from bulk tank (weekend / evening storage) Step 1 Incoming milk Step 4 - CCP2 Milk temperature from farm chill Step 3 Preheated to Milk direct from around 32C cows to VAT Heat to 32C in Add starter and ripen Milk between 0.18 and 0.22 Lactic Acid Add rennet Cutting, scalding and stirring Cheddaring Milling Lactic 248kg Acid<=0.45%@6.5hrs after renneting CCP5 Salting weigh Moulding and Pressing Small Cloth Bound 25kg cheeses Vac Packed Bandaging Pack marked with Sew on VAT code batch code Maturation 6 to 24 months ~8 to 13C 25kg whole Vacuum packed Waxed cheeses Small cloth bound Grated de-clcothed Processed Plasticoated Packed Despatched whole cutting, vacuum Flavours added Wrapped in muslin Lossed in sealed and labelled packing and Waxed and vac bag Labelled

1 gallon milk makes 11lb cheese. Weight loss "approx 52%)

Jeanie McAvennie 17-Jan-17

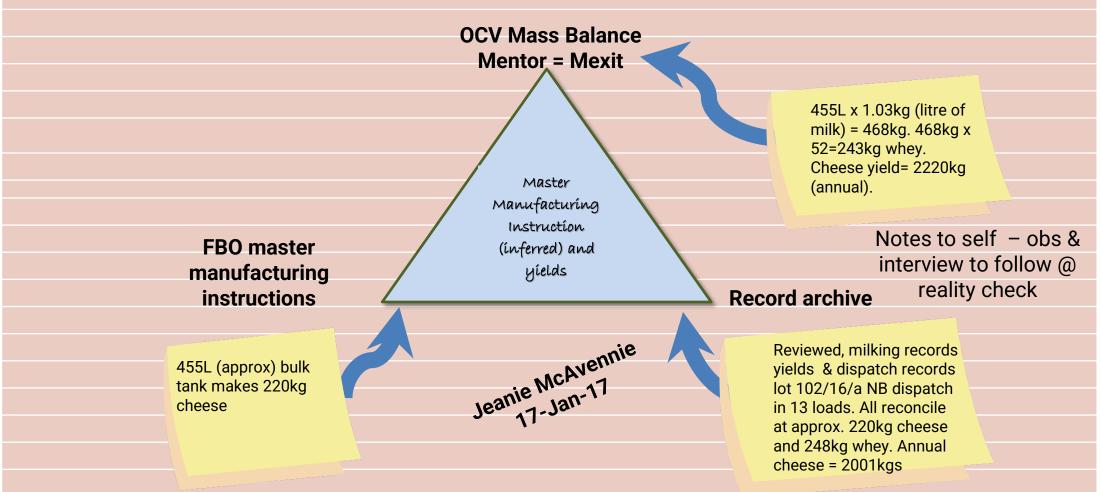
∴ 4.55L makes 2.2kg cheese∴ 445L = makes 220kg

cheese ∴ weight loss should be 248 approx



Notes :- Triangulating FBO proposition re process control and composition.

Random number = 201 ∴ production day 201. Lot mark = 102/16/a (Sample size is 13 @ 95% confidence)





Strengths	Limitations / Points to Consider
 If input/output data exists, this method can be relatively cost-effective; otherwise it can be costly Can obtain estimates of FLW where no direct data exists (e.g, estimate FLW from food supply and consumption) Depending on how data are collected, may help identify waste hotspots (e.g, food categories) 	 Can have large inaccuracies depending on the type of data available Difficult to estimate uncertainties Requires quantification of all major flows of food (e.g, food going to feed animals) Difficult to apply if there is substantial addition or removal of water (e.g, evaporation of water during cooking) May be difficult to determine root causes



Exercise – a mass balance









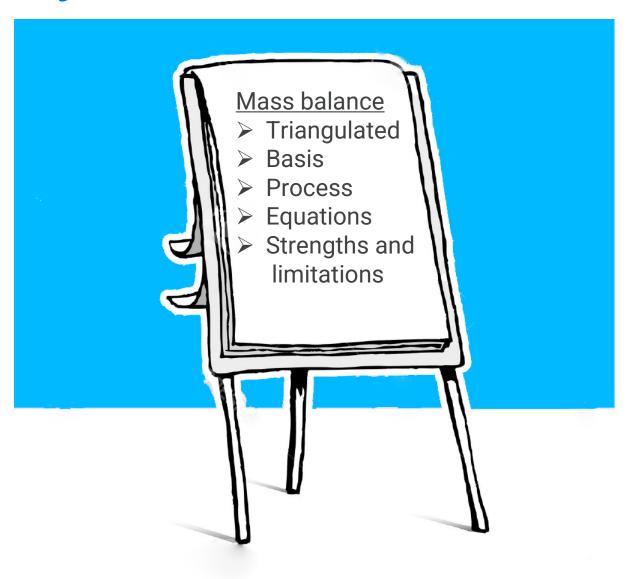
Overlaps

Yields – mass balances, traceability – product recall



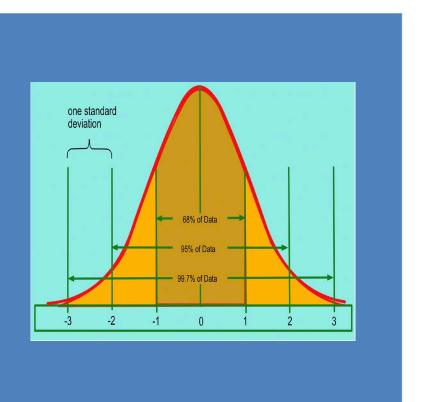


Mass balance summary

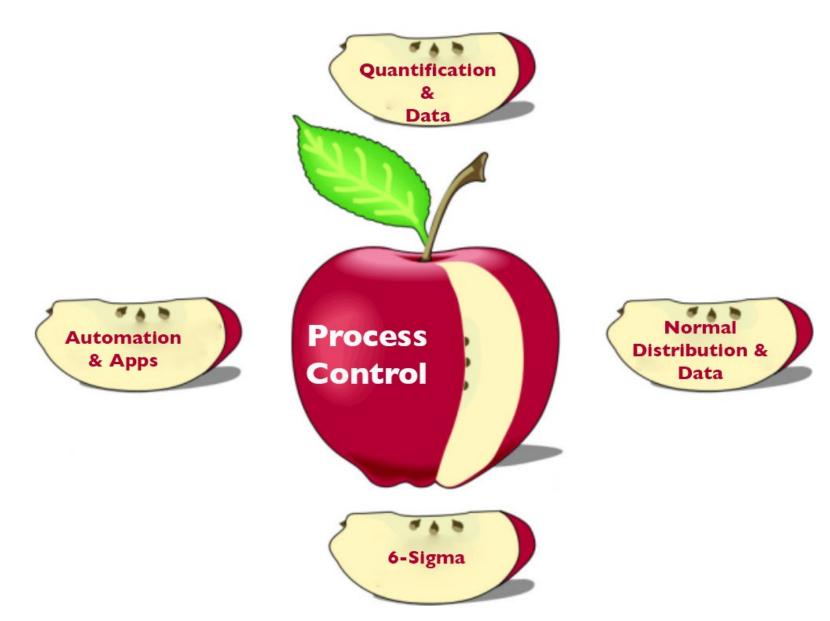




EMOs and process control







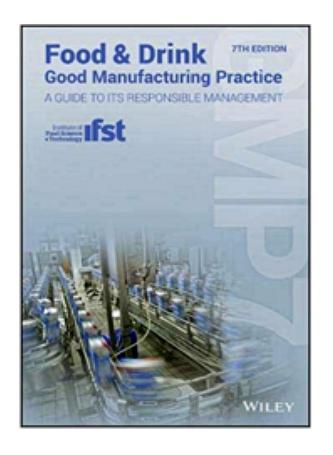


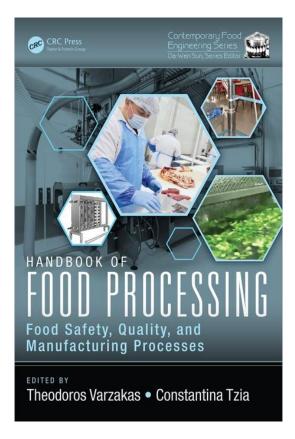
Process control overview

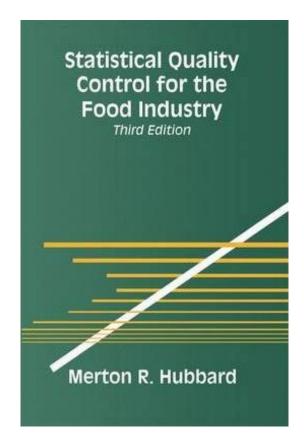


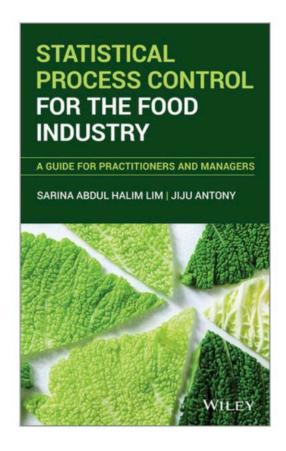


Sources





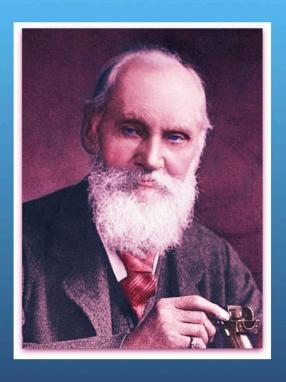






Quantification

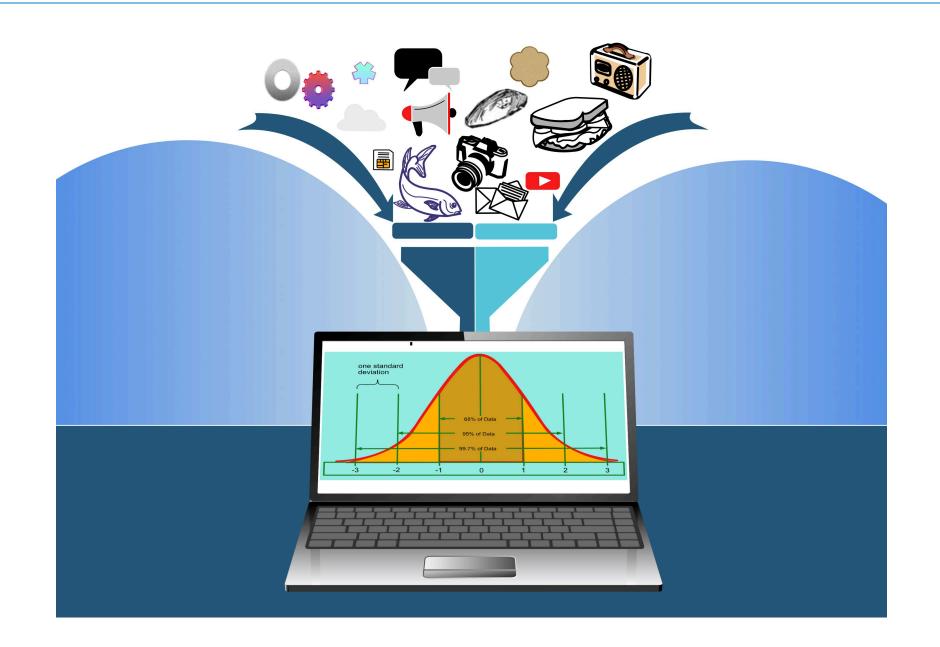
Lord Kelvin on quantification and scientific knowledge



I often say when you can measure what you are speaking about, and express it in numbers, you know something about it, but when you cannot measure it, when you cannot express it in numbers, your knowledge is of a meagre and unsatisfactory kind; it may be the beginning of knowledge, but you have scarcely, in your thoughts, advanced to the stage of science, whatever the matter may be.

Lecture on "Electrical Units of Measurement" (3rd May 1883) published in Popular Lectures



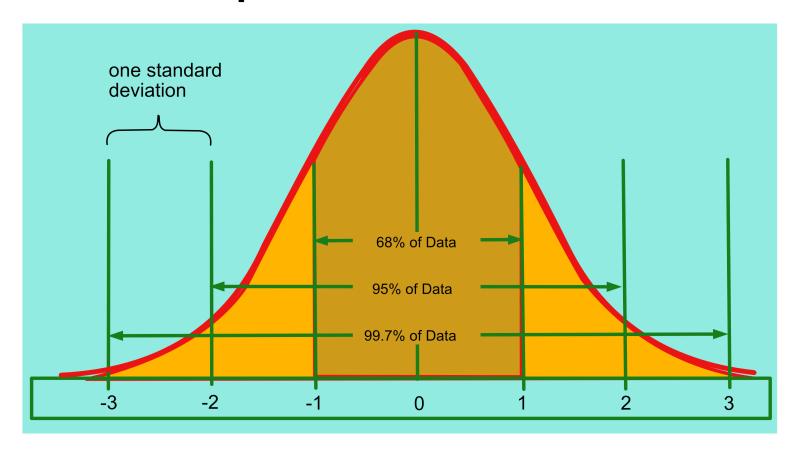




Statistical Process Control Kai =Change Zen = Good 50% of 50% of the Area the Area Д Mean



The Empirical Rule





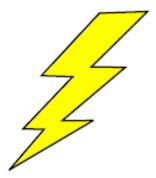
Common cause and special cause variation

Common cause variation

 A source of variation caused by unknown factors that result in a steady but random distribution of output around the mean/average of the data. Common cause variation is a measure of the process's potential, or how well the process can perform when special cause variation is removed.

Special cause variation

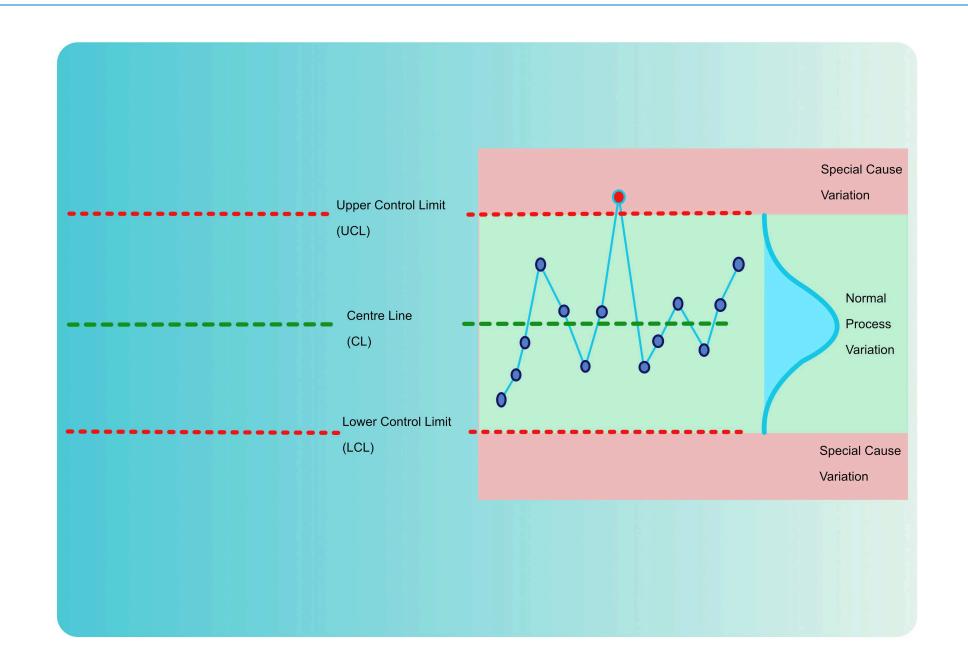
• Special cause variability is a shift in output caused by a specific known factors such as environmental conditions or processing errors. It is insidious but can be accounted for directly and potentially removed. It is a measure of process control. Also referred to as "exceptional" or "assignable" variation.



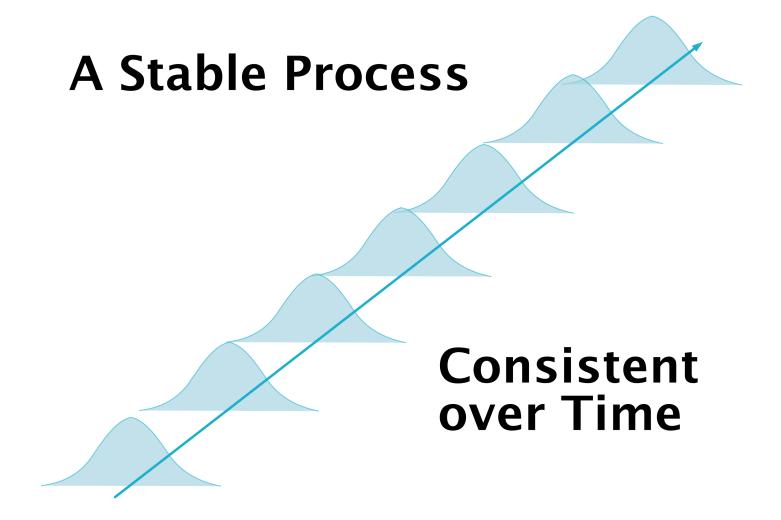




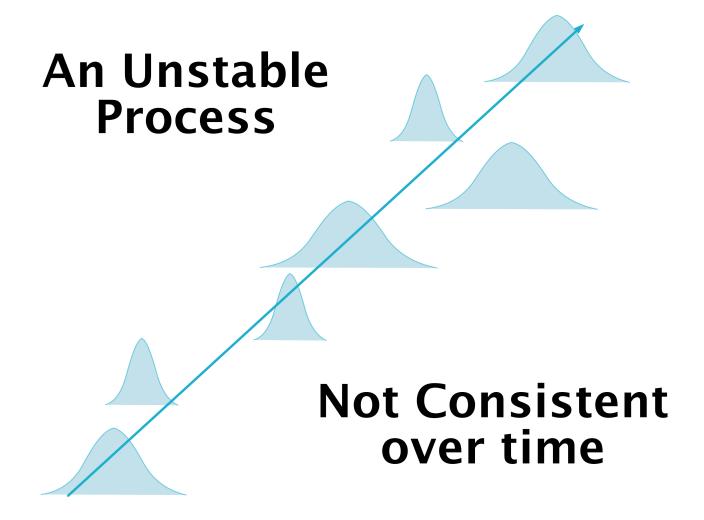




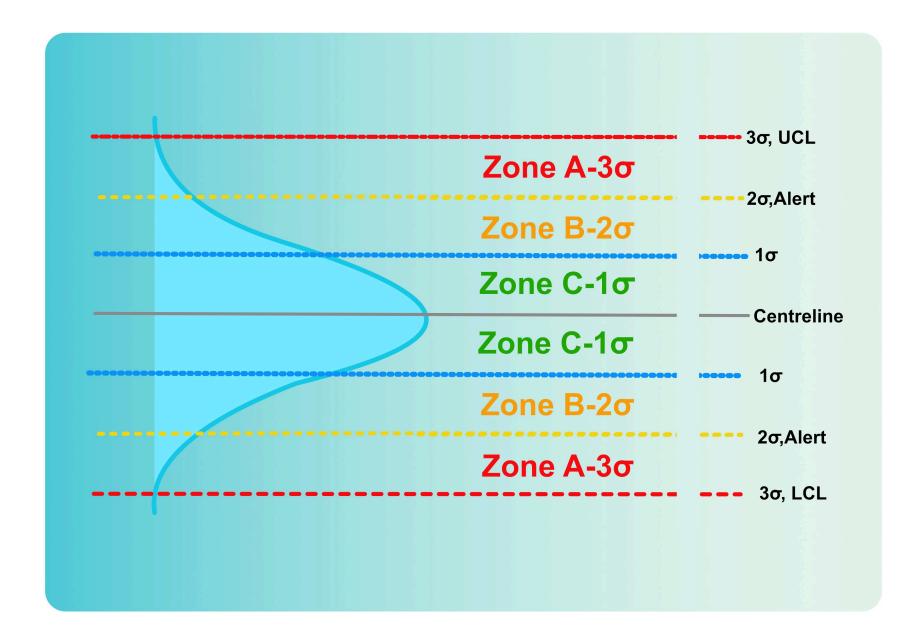




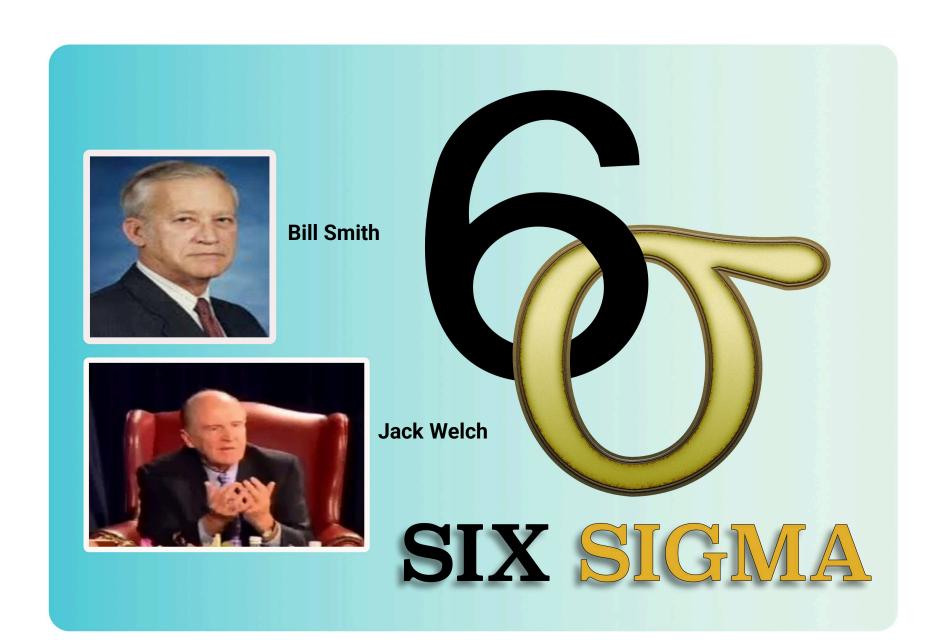




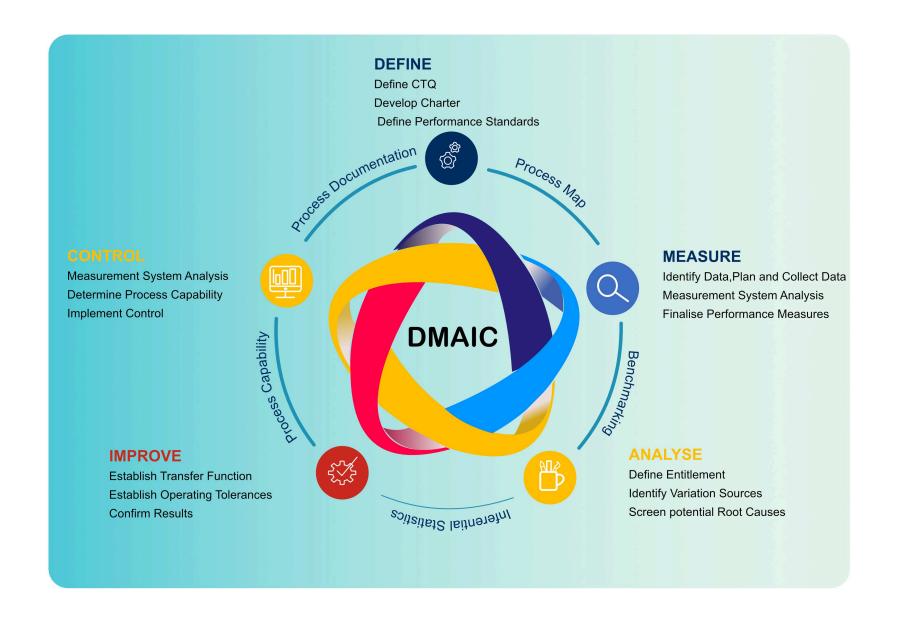




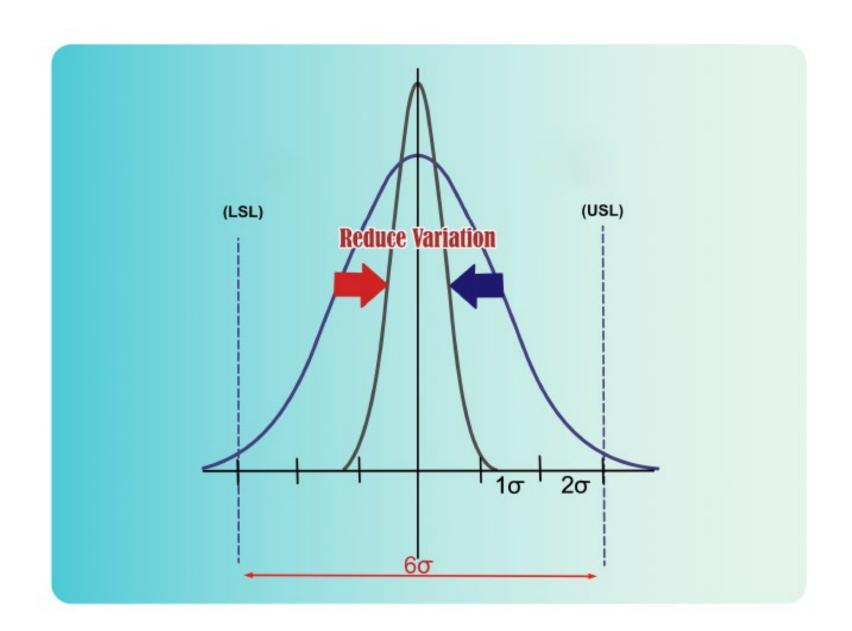






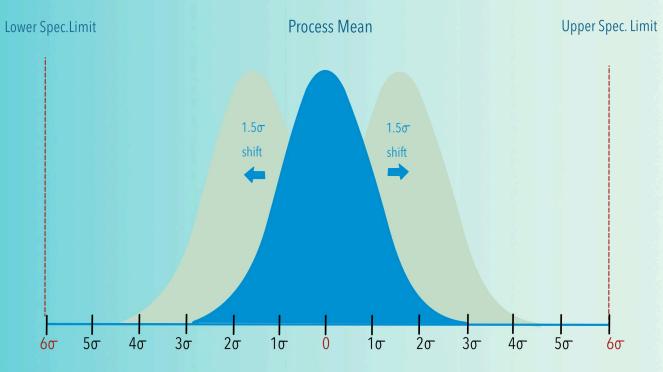








Six Sigma Statistically Visualised



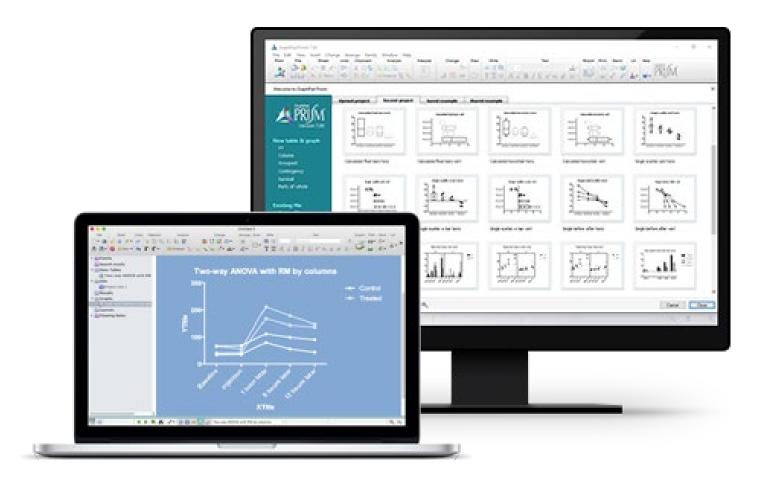
The term Six Sigma is based on a statistical concept defective items can be minimised by maintaining 6 standard deviations (6 Sigmas) between the process mean(average)and its Upper and lower specifications







Graph Pad – www.graphpad.com

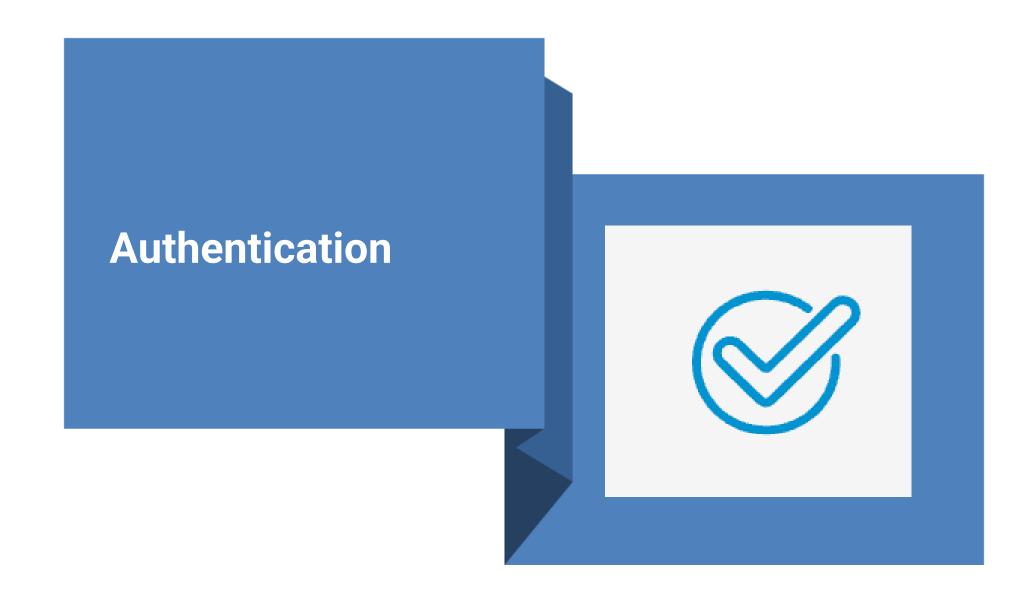




Process control summary





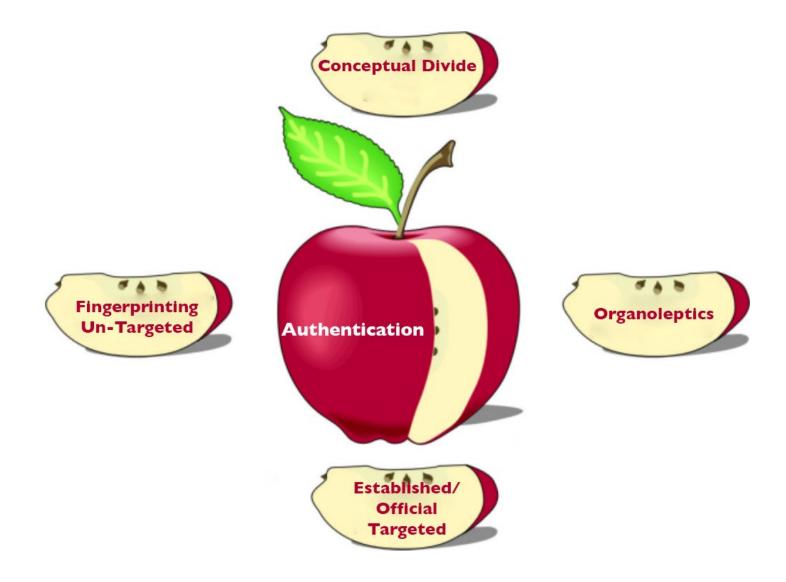




Authentication overview

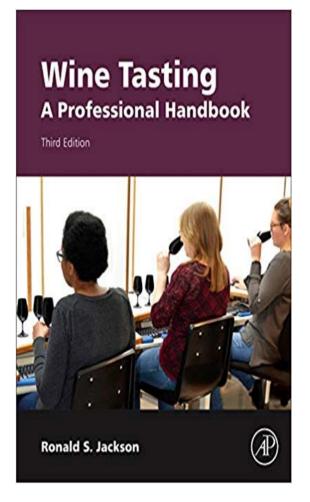


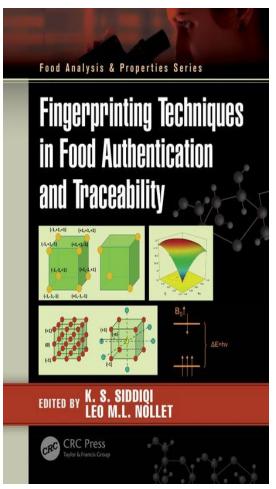


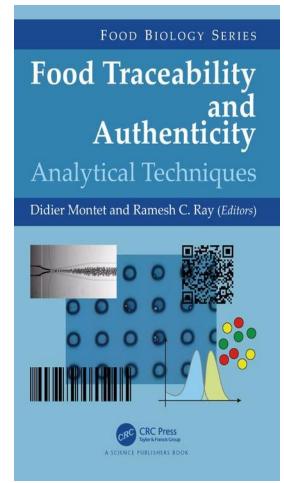


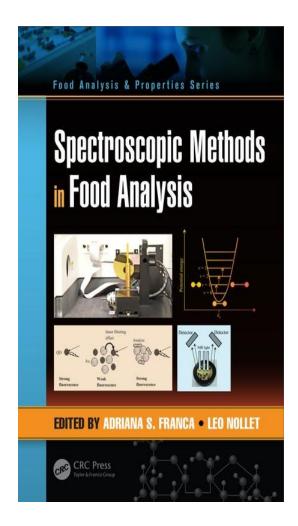


Sources



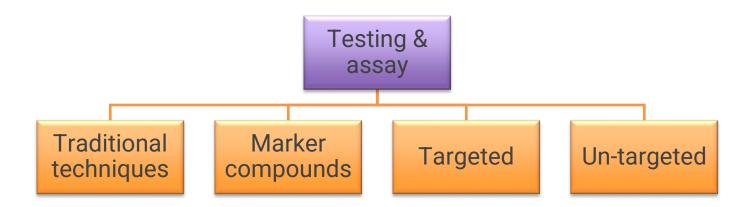






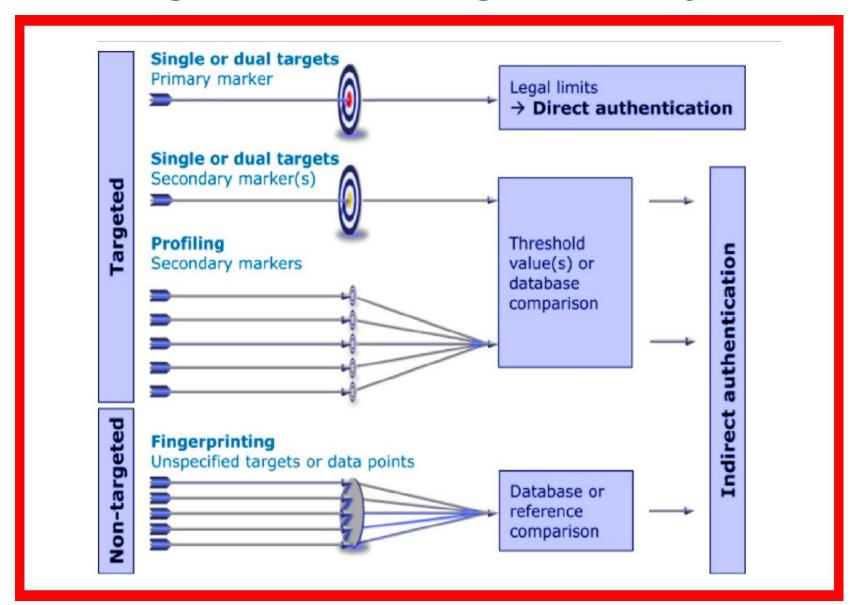


Conceptual divide





Forensics – targeted vs un-targeted analysis





Simple quantification











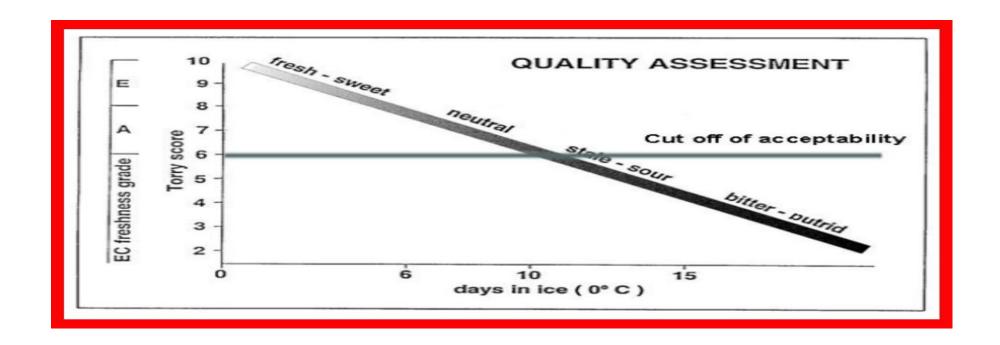
Organoleptics





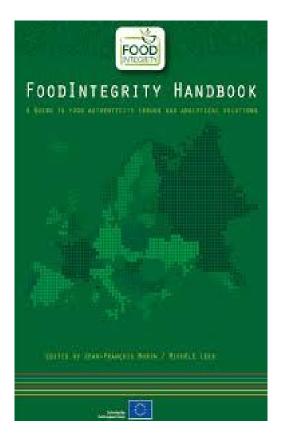


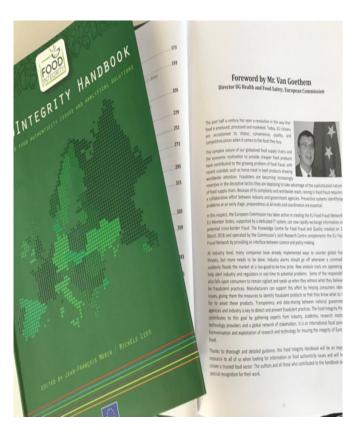
Organoleptics





Targeted authentication





4. Overview of methods for authenticity testing

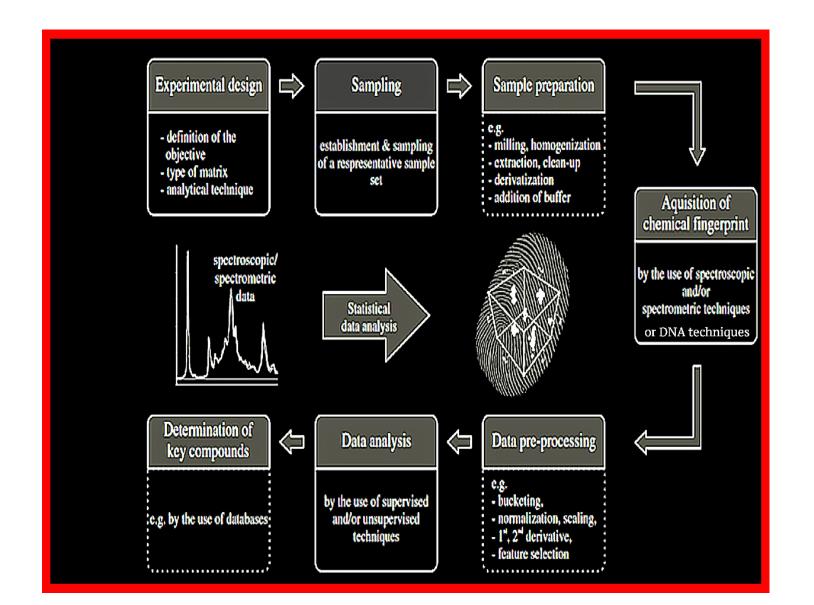
The following tables provide a summary of the official and commonly used methods respectively and the authenticity issues they address.

Table 3: Official methods for authenticity testing of meat and meat products

Table 3: Official methods for authenticity testing of meat and meat products		
Analytical technique	Indicative data or analyte	Authenticity issue / information
Multiplex PCR	Molecular biomarker	Species substitution
ORBIT (overnight rapid bovine identification test)	Antibodies and antigens	Species substitution
PROFIT (poultry rapid overnight field identification test)	Antibodies and antigens	Species substitution
Kjeldahl	Nitrogen content	Protein substitution
Automated dye binding	Protein content	Protein substitution
Combustion method	Crude protein	Protein substitution
ELISA	Soy proteins	Protein substitution
Gravimetric method	Total fat content	Fat substitution
Colorimetric method	Nitrites and nitrates	Addition of nitrites and nitrates
Spectroscopic method	Nitrites and nitrates	Addition of nitrites and nitrates
Fluorimetric method	Total vitamin C	Addition of ascorbic acid
Spectrometric method	Total phosphorus content	Addition of phosphorus and polyphosphates
Thin layer chromatographic separation	Linear condensed phosphates	Addition of phosphorus and polyphosphates
Gravimetric method	Total phosphorus content	Addition of phosphorus and polyphosphates
Spectroscopic method	Total phosphorus content	Addition of phosphorus and polyphosphates
Thin layer chromatographic method	Synthetic, water-soluble colouring agents	Addition of colouring agents
Titrimetric method	Sulphurous acid (free form)	Addition of sulphur dioxide
Spectroscopic method	Sorbates, ascorbates, benzoates, sulphites	Addition of preservatives
Gravimetric method	Water	Addition of water
Nuclear magnetic resonance	Water	Addition of colouring agents, aromas and preservatives

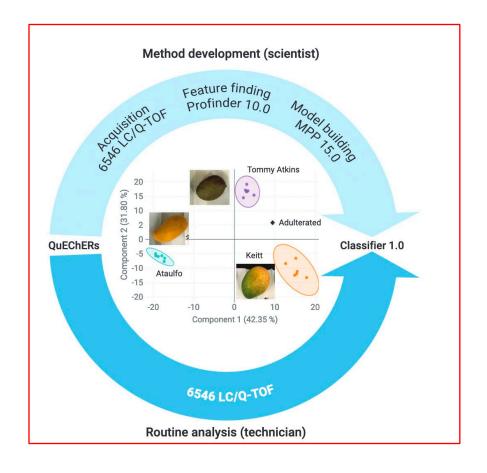


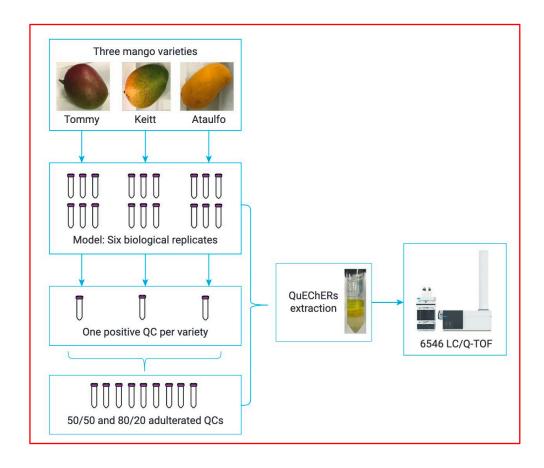
Fingerprinting





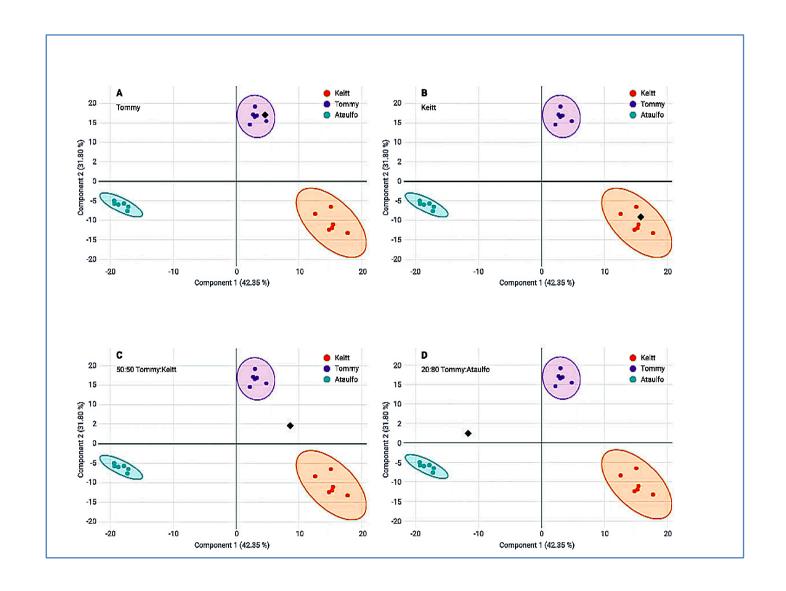
Mass spectrometry







MS profile for the mango case study





Isotope-ratio mass spectrometry (IRMS)

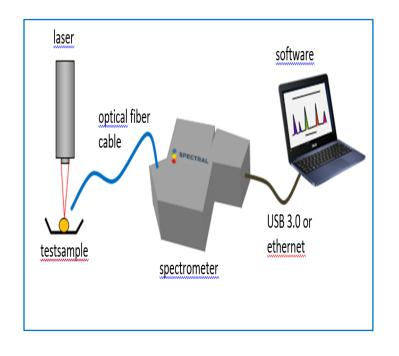


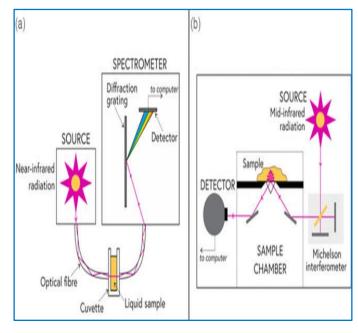






Spectroscopy



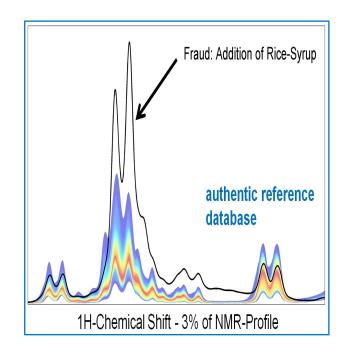


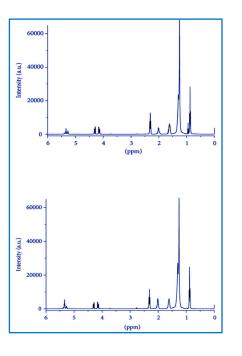




Nuclear magnetic resonance



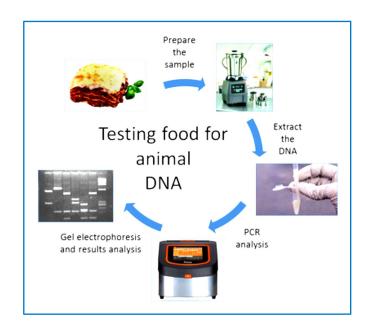






DNA analysis









Authentication summary





Managing the Verification of Food Authenticity and Integrity

Assuring Food Authenticity & Integrity - Protecting the Food Sector from Threats and Vulnerabilities

Andrew MacLeod BSc (hons) BSc. Pg Dip (Food Safety) CSci (Food Sci & Tech) FIFST FS Prin (IFST)



Thank you

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Optional contact details

