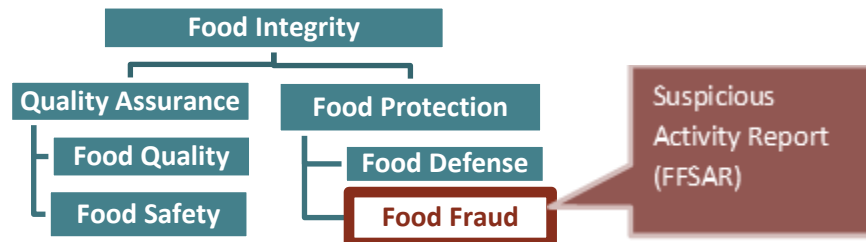




Food Fraud Prevention THINK TANK

Primer on the Food Fraud Suspicious Activity Report (FFSAR)

2023



Food Fraud Prevention –

Food Fraud Suspicious Activity Report (FFSAR) Tool

Food fraud is one of the most important and urgent issues facing the food industry because of consumer safety concerns. There is also an increased reporting of incidents in social media, traditional media, and in scientific reports. Moreover, the number of reported false alarms indicates there is a need for standardized investigation methods and processes. This Food Fraud Suspicious Report (FFSAR) tool was created for a wide range of users, including journalists, regulators, public relations professionals, criminal investigators, criminal intelligence analysts, food authorities, and other researchers. The FFSAR tool provides a logical and methodical review, investigation, and (if necessary) report of a food fraud incident. The FFSAR can be used for organizing information before beginning the more formal and methodical criminal intelligence analysis, supply chain mapping, or Hot Spot analysis.

The method and process are designed to provide a methodical way to assess suspicious activity. This would be incorporated into the corporate-wide-ident management, early warning system, or quality management system.

The process includes:

1. Define the scope of the question and the response: Review the resource-allocation decision-maker needs.
2. Food Fraud Suspicious Activity Report (FFSAR) method review.
 - a. Pre-Filter
 - b. FFSAR Survey
 - c. Summary and Actions
3. Summary and Next Steps for this initial review.

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Food Fraud Suspicious Activity Report (FFSAR) Tool – Detail

This section provides the steps to complete the process.

Pre-Filter: Conduct a Quick Review of the Information and the Problem

Before conducting an analysis, review if there is enough information to immediately act (Table). In some instances, there are immediate action items or responses such as the identification of a food safety incident.

Table: FFSAR – Pre-Filter		
Question	Yes/ No/ Maybe	Detail (Such as link to the regulation)
Is the action a direct violation of a law or regulation?		
<ul style="list-style-type: none"> Is the action illegal in the country of origin? 		
<ul style="list-style-type: none"> Is the action illegal when received or processed in the country of receipt? 		
<ul style="list-style-type: none"> Is the labeling on the finished product illegal? 		
Is the action a direct violation of certification or standard?		
Is the action a direct violation of a commercial agreement such as a supply contract?		
Is the action a health hazard?		
Is the action a lack of GMP that could lead to a health hazard?		
Does the action represent a vulnerability that is unacceptable?		
How would an unacceptable vulnerability be assessed?		

FFSAR: Conduct the Food Fraud Suspicious Activity Report Survey

The survey is included here (Table):

Table: FFSAR – Suspicious Activity Report – Survey
1.1. What is the concern?
1.2. What is the <u>type</u> of information (e.g., lab test, rumor, investigation report, etc.)?
1.3. What is the <u>source</u> of information (e.g., internal company, industry competitor, industry stakeholder, consumer, inspector, investigator, general concern, consumer advocate, etc.)?
1.4. Date: Of event or incident?
1.5. Source of Samples: What is the geographic source of samples, e.g., one store, one city, one region, one supply chain channel, etc.?
1.6. Compliance: What specific law or regulation has been violated? What certification or standard has been violated? Is the claim a civil violation against a commercial specification?
2. Raw materials – are critical raw materials used in the finished product authentic? Critical raw materials would be defined as those raw materials that may significantly affect.
2.1. Name of Product:
2.2. Ingredient List:
2.3. Nutrient Labeling:
2.4. Health Claims (nutrient content claims, health claims, qualified health claims, structure/function claims):
3. Supplier
3.1. Has the source been vetted and approved? By what certification or process?
3.2. Is there a history of any significant situation at the supplier that could lead to fraud?
3.3. Has the supplier’s supply chain (e.g., tier 2, tier 3, etc.) been reviewed (e.g., such as by another certification or review of supply chain programs)?
4. Processing – Would processing alter any of the critical raw materials where when tested for the presence of may not be detectable (e.g., denaturation, masking, etc.)?
5. Formulation – Would other raw materials interfere with the critical raw materials where when tested for the presence of may not be detectable?
6. Tampering – test sample or retail package: Could a consumer or competitor intentionally adulterate the product to make it fraudulent? Has the package been tested or analyzed for tampering or modification?
7. Authenticity Testing – Has the correct method to confirm the presence of the critical ingredient been selected and performed by a qualified laboratory? Is there an accepted method to test for the presence of the critical ingredient? Was a “validated method” followed including a standardized sampling plan?

Conclusion: Summary and Actions

After the first review of the FFSAR a summary and recommended actions are developed (Table). This is an example that can be adapted for specific needs.

Table: FFSAR – The Summary and Actions Report Template
PROJECT (1 page): Food Fraud Suspicious Activity Report Method (FFSAR) – Summary and Actions
ACTION – IMMEDIATE? INCIDENT STATUS? – Detail: Comment
SUMMARY (100-words-maximum): Comment
Suspicious Act – <Summary Statement> (One line): Comment (100 words maximum)
ACTION STEPS: list and number all action items – and assign actor and due date
AUTHOR: List of who authored this report
DATE: When this report was completed and then updated
Next Immediate Action assigned to and Due Date: List of who will immediately act on what task

References:

- Food Fraud Prevention – Advanced Criminology MOOC
 - www.FoodFraudMOOC.com
- Food Fraud Suspicious Activity Report (FFSAR) Tool
 - Spink, John; Evans, Bradley; & Freedman, Eric (Under Review). Introducing the Food Fraud Suspicious Activity Report (FFSAR) Tool: Organizing Information for an Intelligence Assessment or Hot Spot Analysis, (Submitted March 24, 2019); Co-authors: Evans, Department of Marketing, Business School, University of Auckland (New Zealand); & Freedman, Knight Center for Environmental Journalism, College of Communication Arts and Sciences, MSU), www.FoodFraudPrevention.com

