

MICHIGAN STATE UNIVERSITY

May 14, 2019

To: GFSI Version 8 Draft Review Team, gsibm@theconsumergoodsforum.com

Review and Public comments on the GFSI Public Consultation on Benchmarking Requirements DRAFT Version 8 – MSU-FFI Public Comments

We are pleased to participate in the GFSI review process. Attached you will find our comments and recommendations.

1. Scope: The new numbering system is helpful and it is efficient to be consistent with ISO 22000.
2. Scope: It is efficient that the topic numbers are consistent through all the sections. Food Fraud is Topic Number 8.
3. Glossary - Recommendation: add terms for food defence that match food fraud expanding from just the food defence definition to also include food defence threat.
 - a. Section Recommendation: In the sections, add to the "Clause Name/ Requirement" a header in the "Requirement" cell. See details below. For example, changing "A food fraud vulnerability assessment procedure shall..." to "**Food fraud vulnerability assessment:** A food fraud ~~vulnerability~~ assessment procedure shall... ."



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Thank you for the opportunity to comment on this draft document.

Sincerely,

A handwritten signature in black ink that reads "John W. Spink." The signature is written in a cursive style.

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Appendix: Detailed Comments

4. Scope/ Organization:
 - a. The new numbering system is helpful and it is efficient to be consistent with ISO 22000.
 - b. It is efficient that the topic numbers are consistent through all the sections. Food Fraud is Topic Number 8.
5. Glossary:
 - a. It is excellent to note the reference.
 - b. For food fraud – and in some cases for food defence – possibly reference the previous GSFI guidance documents including the July 2014 Food Fraud Position Paper and the May 2018 Food Fraud Technical Document. This will both clarify the source of the definition and also provide a resource for further review.
 - c. Food Fraud: no changes in the document and no recommendation.
 - d. Food Defence: no changes in the document and one recommendation.
 - e. **Recommendation: add terms for food defence that match food fraud expanding from just the food defence definition to also include food defence threat.**
6. Sections:
 - a. Clause name: It is understandable that the “Clause Name” includes the overall term but it is also confusing that the detail has been removed. For example from “Food Fraud Vulnerability Assessment” to “Food Fraud” and then the “Requirements” detail of the vulnerability assessment. It may be too complex to add a “Sub-Clause Name.”
 - b. RECOMMENDATION: In the sections, add to the “Clause Name/ Requirement” a header in the “Requirement” cell.
 - c. This comment uses FSM AI but it applies to all sections.
 - d. FSM AI 8.1 Food fraud (previously FSM AI 21 – Food Fraud Vulnerability Assessment)
 - i. Note the v7.2 requirement was: Food Fraud Vulnerability Assessment – “The standard shall require that the organisation has a documented food fraud vulnerability assessment procedure in place to identify potential vulnerability and prioritise food fraud mitigation measures.”
 - ii. Draft v8: “A food fraud vulnerability assessment procedure shall be established, implemented and maintained to identify potential vulnerability and prioritize food fraud mitigation measures.”
 - iii. RECOMMENDATION v8: **“Food fraud vulnerability assessment: A food fraud vulnerability assessment procedure shall be established, implemented and maintained to identify potential vulnerability and prioritize food fraud mitigation measures.”**

- e. FSM AI 8.2 Food fraud (previously FSM AI 21.1 – Food Fraud Mitigation Plan)
 - i. Note the v7.2 requirement was: 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 food fraud vulnerabilities.”
 - ii. Draft v8: “A documented food fraud plan shall be in place specifying the measures implemented to mitigate the public health risks from the identified food fraud vulnerabilities.”
 - iii. RECOMMENDATION v8: :”**Food Fraud Plan**: ~~A documented food fraud plan~~ shall be in place specifying the measures implemented to mitigate the public health risks from the identified food fraud vulnerabilities.”
- f. FSM AI 8.3 Food Fraud (previously xxx)
 - i. Note – the v7.2 requirement was: Food fraud mitigation plan – “The standard shall require that the organization's Food fraud mitigation plan shall be supported by the organisation’s Food Safety Management System.”
 - ii. Draft v8: “This food fraud mitigation plan shall be supported by the organization's Food Safety Management System.”
 - iii. RECOMMENDATION v8: **Food Fraud Plan Integration**: ~~This food fraud mitigation plan~~ shall be supported by the organization's Food Safety Management System.”
- g. FSM FII 8.4 (FII is Food Broker/ Agent) – an additional Clause is included for this section.
 - i. Note the v7.2 requirement was: NO CLAUSE
 - ii. Draft v8: “The agent / broker shall ensure that their suppliers comply to key elements FSM 8.1, 8.2, 8.3.”
 - iii. RECOMMENDATIO v8: **Food Fraud Supplier Expectations** – “The agent / broker shall ensure that their suppliers comply to key elements FSM 8.1, 8.2, 8.3.”