

Food Fraud Table Top Exercise (FFTTX)



Something's Fishy

FDA's Innovative Food Defense Program (IFDP)
Grant Deliverable

June 18, 2013 *(Updated September 12, 2016, Ongoing)*
East Lansing, Michigan

See Video:
1. Title

Original Program: MDA & MSU



Michigan Department of
AGRICULTURE
& Rural Development

MICHIGAN STATE UNIVERSITY

Food Fraud Table Top Exercise (FFTTX)

Something's Fishy



FDA's Innovative Food Defense Program (IFDP)
Grant Deliverable
June 18, 2013
East Lansing, Michigan

Introduction

- Brad Deacon, JD
 - Emergency Management & Administrative Law Coordinator
 - DeaconB9@Michigan.gov <http://www.Michigan.gov/radard>
- John Spink, PhD
 - Director, MSU Food Fraud Initiative
 - SpinkJ@msu.edu, <http://FoodFraud.msu.edu>
- Doug Moyer, PhD
 - Researcher, MSU Food Fraud Initiative
 - MoyerDo1@msu.edu

9:00 to 9:30



Michigan Department of
AGRICULTURE
& Rural Development

MICHIGAN STATE UNIVERSITY

DHHS/FDA Innovative Food Defense Program Grant (PAR-12-116) Michigan Department of Agriculture Sub-Contract to Michigan State University.

- Principle Investigator: Brad Deacon/MDA,
- MSU Principle Investigator: John Spink, Co-PI: Douglas Moyer.

FDA FREE-B Program

- FDA.gov, Free-B Overview
- (pre-FSMA definition of Food Defense that included economically motivated adulteration)
- <http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm295902.htm>

The image displays a screenshot of the FDA website's 'Food Related Emergency Exercise Bundle (FREE-B)' page. The page header includes the FDA logo and navigation tabs for 'Home', 'Food', 'Drugs', 'Medical Devices', 'Radiation-Emitting Products', 'Vaccines, Blood & Biologics', 'Animal & Veterinary', 'Cosmetics', and 'Tobacco Products'. The main content area features a sidebar with 'Tools & Educational Materials' such as 'Food Defense Acronyms, Abbreviations & Definitions', 'Food Defense 101 (including ALERT)', 'Food Defense Plan Builder', 'Food Related Emergency Exercise Bundle (FREE-B)', 'Employees FEEST', 'See Something, Say Something Campaign', 'Vulnerability Assessment Software', and 'Mitigation Strategies Database'. The main text describes the FREE-B as a compilation of scenarios for food emergency response, developed in cooperation with the CDC and USDA. A video player is embedded on the page, showing a man in a suit, identified as Jason Bashura, General Health Scientist at the Office of Food Defense, Communication and Emergency Response, FDA. The video title is 'FREE-B Informational Video'. The Michigan State University logo is visible in the bottom left corner, and the website address 'www.FoodFraud.msu.edu' is at the bottom center.

U.S. Department of Health and Human Services
U.S. Food and Drug Administration
Protecting and Promoting Your Health

Home > Food > Food Defense > Tools & Educational Materials

Food Related Emergency Exercise Bundle (FREE-B)

Watch the FREE-B Informational Video

DOWNLOAD FREE-B

The Food Related Emergency Exercise Bundle (FREE-B) is a compilation of scenarios based on and unintentional food contamination events. It is designed with the intention of assisting DOH and public health agencies in assessing existing food emergency response plans, protocols, and procedures that may be in place, or that they are in the process of revising or even developing. The FREE-B includes scenarios for multiple jurisdictions and organizations (medical community, private sector, law enforcement, and other communities) to 'play' with the host agency, or, quite simply, for an individual agency to use as a model for their own protocols and procedures independently.

FDA developed FREE-B in cooperation with the Centers for Disease Control and Prevention (CDC) and the Department of Agriculture's Food Safety Inspection Service (FSIS) and Animal and Plant Health Inspection Service (APHIS). Additionally, numerous subject matter experts participated in various rounds of review to develop the FREE-B.

The FREE-B is a set of eight (8) scenarios, each of which contains a Facilitator's Guide and a Scenario.

Jason Bashura
General Health Scientist
The Office of Food Defense, Communication and Emergency Response, FDA

MICHIGAN STATE UNIVERSITY

www.FoodFraud.msu.edu

FREE-B on Food Fraud

- 72 participants in Lansing, Michigan; on-line team in Minnesota Department of Agriculture (MDA) and NCFPD
- Representatives from Federal, State, Local, Industry, and Academia; Enforcement, Public Health, and Regulators.

Also conducted at IFT and NEHA



MICHIGAN STATE
UNIVERSITY

www.FoodFraud.msu.edu



FDA FSIS

Introduction

■ Brad Deacon, JD

- Emergency Management Law Coordinator
- Michigan Department of Agriculture and Rural Development (MDARD)
- DeaconB9@Michigan.gov <http://www.Michigan.gov/mdard>

■ John Spink, PhD

- Director & Assistant Professor, Food Fraud Initiative
- Michigan State University (MSU)
- SpinkJ@msu.edu, www.FoodFraud.msu.edu

■ Doug Moyer, PhD

- Researcher, Food Fraud Initiative, MSU
- Assistant Professor, Program in Public Health, MSU
- MoyerDo1@msu.edu

9:00 to 9:30

Introduction

Logistics and Administrative: Morning Agenda

8:30 – 9:00 Registration and Refreshments

9:00 – 9:30 Welcome and Overview

9:30 – 10:00 Module 1: Pre-Incident

10:00 – 10:15 Break

10:15 – 11:00 Module 1: Exercise/ Recap

11:00 – 11:15 Module 2: Early Incident

11:15 – Noon Module 2: Exercise/ Recap

Noon – 1:00 Lunch

Introduction

Logistics and Administrative: Afternoon Agenda

1:00 – 1:15	Module 3: Late Incident and Aftermath
1:15 – 2:00	Module 3: Exercise/ Recap
2:00 – 2:15	Break
2:15 – 2:30	Module 4: Aftermath
2:30 – 3:15	Module 4: Exercise/ Recap
3:15 – 3:30	Evaluation and Closing Comments

Introduction

Logistics and Administrative:

- Safety / Comfort – Note exits / restrooms
- Name Tags – Those with duties for today's TTX
- Primary Participant Groups

Introduction

Funding for the development and piloting of this training exercise was made possible by a grant from the Food and Drug Administration.

■ FDA's Innovative Food Defense Program (IFDP)

- US Department of Health and Human Services, Food and Drug Administration, Innovative Food Defense Program Grant (PAR-12-116) (R18) Michigan Department of Agriculture Sub-Contract to Michigan State University. Principal Investigator: Brad Deacon/MDARD, MSU Principal Investigator: John Spink, Co-PI: Douglas Moyer.

Action:

- Introductions around the room

SEE NEXT VIDEO

2. Grant

Grant Aim and Scope

See Video:
2. Grant

Food defense is a term used to describe activities associated with protecting the nation's food supply from intentional contamination. FDA has adopted 3 broad strategies that encompass its food defense activities:

- **Awareness (Prevention/Preparedness):** Increase awareness among federal, state, local, Tribal and territorial governments, and the private sector, to better understand where the greatest vulnerabilities lie and develop effective protection/mitigation strategies to shield the food supply from intentional contamination;
- **Response:** Develop the capacity for a rapid coordinated response to a food borne terrorist attack; and
- **Recovery:** Develop the capacity for a rapid coordinated recovery from a food borne terrorist attack.

Award Project Area

There are five (5) key project areas identified for this effort:

- Innovative Food Defense Plan Integration
- Education and Awareness Information Dissemination as this is an education project. The project innovatively uses a tabletop exercise to create awareness of EMA and food fraud. The exercise will also demonstrate how these concepts relate to both food safety and food defense.
- Innovative Food Defense Training
- Information Technology / Database Development
- Vulnerability Assessments using FDA's Vulnerability Assessment Software Tool

Award Title and Abstract

Development and Implementation of Food Defense Tabletop Workshop Exposing and Mitigating the Vulnerability of Economically Motivated Adulteration and Food Fraud Incidents

The development of the content and the tabletop exercise project is relevant to public health and counterterrorism since increasing the awareness of economically motivated adulteration and food fraud, is itself a threat but also would reduce future opportunities for malicious attacks. This project leverages theoretical leadership and strong relationships between the Michigan Department of Agriculture and Rural Development (MDARD) and Michigan State University (MSU).

Award Specific Aims

- **Specific Aim #1:** Define EMA and food fraud. This would expand on previous work to address specific questions and present findings. This would also include analysis of FSMA, the FDA Working Group on EMA, and recent publications.
- **Specific Aim #2:** Assess how public-private partnership communication and action would be optimized.
- **Specific Aim #3:** Increase awareness and optimization of resources through a tabletop exercise for the relevant stakeholders. For broader dissemination this would include the development of a FREE-B exercise. The research will also be incorporated into food safety classes at MSU.

Introduction

Purpose and Scope

- It is crucial that we ensure that food products are safe for consumption
- Everyone involved in the food chain, from farmer through consumer, has a responsibility to keep the food supply safe
- At any point during production or distribution, food can be contaminated either accidentally (food safety), or on purpose from sabotage or terrorist activities (food defense)
- Intentional contamination also includes Food Fraud

Introduction

Purpose and Scope, cont.

- DHHS FDA, CDC, USDA FSIS working with State and Local agencies work closely to safeguard the American food supply
- Continuously seek new ideas and strategies to reduce the incidence of human health incidents and to support food defense-related innovation

Introduction

Goals

- This tabletop exercise provides participants with an overview of what happens at the local, State and Federal levels during a food related incident
- Focus on the role that key personnel play in containing the problem and protecting consumers

Introduction

Goals, cont.

- Assess plans, policies, and procedures and think about how you would realistically apply them in the event of an incident
- Facilitate discussion among various participating entities, such as Local, State, and Federal entities, and the private sector

Introduction

Objectives

At the conclusion of this tabletop exercise, participants should be able to:

- Articulate their specific roles and responsibilities to other professionals in reacting to a discovered Food Fraud incident
- State the purpose of having multiple agencies assume distinct and sometimes overlapping duties to effectively address and remedy the situation

Introduction

Objectives, cont.

- Collaborate with a diverse group of responders that may not have worked together before; such as the media, law enforcement, risk managers, etc.
- Identify other entities or agencies that are needed to properly address the situation but who have not been included on the team

Introduction

Objectives, cont.

- Propose comprehensive, collaborative and effective ideas, strategies and solutions to ensure the timely remediation of the discovered Food Fraud incident
- Identify the strengths and development needs of their own agencies or departments and identify the actions they will take to champion the change required to improve or enhance their team's ability to detect and respond to a Food Fraud incident

Introduction

Exercise Structure

- This exercise is a highly interactive facilitated exercise with four learning modules:
 - **Module 1 – Pre-Incident**
 - **Module 2 – Early Incident**
 - **Module 3 – Late Incident**
 - **Module 4 – Aftermath**

Introduction

Exercise Structure, cont.

- Open, low-stress and non-public learning environment, and is not intended to set precedents
- Listen to and respect the varying viewpoints of all of the other participants
- Scenario is plausible and the events could occur as presented

Introduction

Exercise Structure, cont.

- Work with each other to provide the expertise needed to ensure that our discussion is accurate and thorough
- Commit to applying learnings from today's activities to your job/function and sharing key learnings with colleagues
- Today's facilitator is not necessarily a subject matter expert, and participants are expected to provide the expertise needed to ensure that our discussion is accurate and thorough.

Introduction

Roles and Responsibilities

- Participant: responds to events based on knowledge and experience
- Evaluator: records events and captures the essence of the dialogue best practices
- Facilitator: leads the exercise and moderates discussions

Introduction

Roles and Responsibilities, cont.

- Table Discussion Leader: representative from each table (volunteered by the group) who will lead the group as they explore discussion questions and the breakout activities
- Table Recorder/Reporter: representative from each table (volunteered by the group) who will ensure that the group discussions are kept on time /records the key themes at the table and is responsible for reporting out during the large group dialogue

Introduction

Personal Learning Inventory (PLI)

- Designed to provide you with a document to capture questions, improvement ideas and action items
- For your use only; PLIs will not be collected; however, you are encouraged to share your PLI with others as a record of your learning experience
- Add to your PLI throughout the day and refer back to it as needed

Action:

- Next presentation

SEE NEXT VIDEO

3. Food Fraud Overview

Food Fraud Overview

John Spink, PhD
Food Fraud Initiative
Michigan State University
(June 2013, Updated October 2015)

9:20 to 9:30

Curriculum

MOOC Food Fraud Series

- Massive Open Online Course – free, online
- Offered in continuously, www.FoodFraud.msu.edu/MOOC

Graduate Courses (Online, Three Credits)

- Anti-Counterfeit & Product Protection (Food Fraud)
- Quantifying Food Risk (including Food Fraud)
- Food Protection and Defense (Packaging Module)
- Packaging for Food Safety

Certificate (Online, Four Courses Each)

- Certificate in Food Fraud Prevention (Food Safety)

Graduate Degree (Online)

- Master of Science in Food Safety
 - www.online.FoodSafety.msu.edu

Defining Food Fraud

- **Action: Deception Using Food for Economic Gain**
 - Including the sub-category of “Economically Motivated Adulteration” or EMA
 - Note: FDA currently defines EMA as a “substance” for “economic gain”
 - Consistent with GFSI, EC/EU, UK, ISO, and others...
- **Motivation: Economic Gain**
 - “Food Defense” motivation is traditionally harm or terror
- **Effect:**
 - Economic **Threat** – **Consumers and Governments expect Food Agency Controls**
 - Public Health **Vulnerability or Threat**

Examples

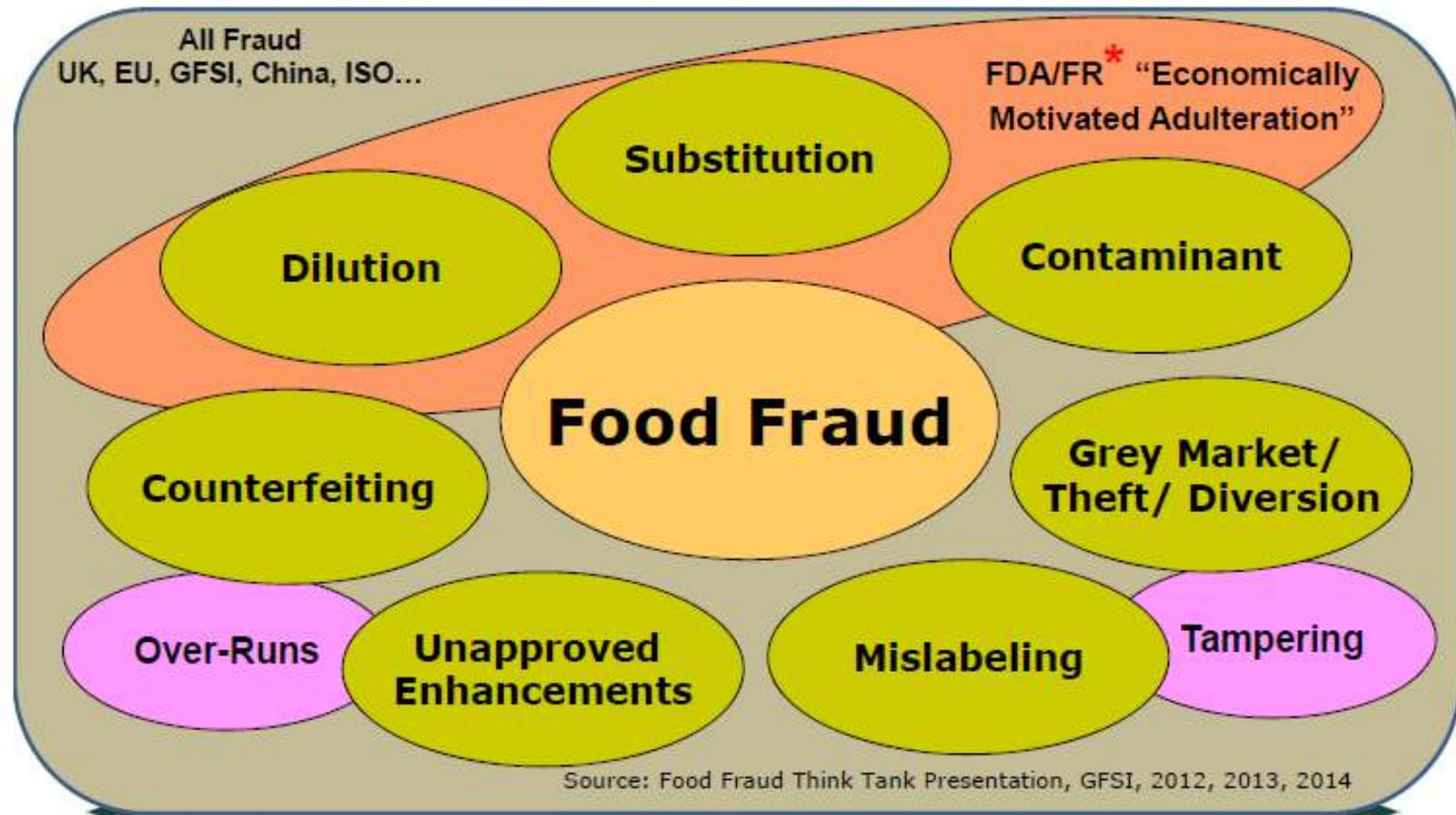
- Horsemeat in ground beef
- Peanut Corporation selling known contaminated product
- Diluted or extra virgin olive oil
- Melamine in pet food and infant formula
- Over-icing with unsanitary water
- Unauthorized unsanitary repackaging (up-labeling or origin-laundering)
- Cargo Theft reintroduced into commerce/ Stolen products
- Expired product date code tampering or “refreshing”

Reference: Spink & Moyer (2011). Defining the Public Health Threat of Food Fraud, Journal of Food Science

Food Fraud Risks

- **Direct food fraud** risk occurs when there is an immediate or imminent risk to the consumer, such as the inclusion of an acutely toxic or lethal contaminant.
- **Indirect food fraud** risk occurs when the consumer is put at risk through long-term exposure, such as the build up in the body of a chronically toxic contaminant through the ingestion of low doses. Indirect risk also includes the omission of beneficial ingredients, such as preservatives or vitamins.
- **Technical food fraud** risk is non-material in nature. For example, food documentation fraud occurs when product content or country-of-origin information is deliberately misrepresented.
- Reference: Spink & Moyer, 2011, Journal of Food Science

What is Food Fraud?



© 2015 Michigan State
University
www.FoodFraud.msu.edu

5

The Food Risk Matrix

Prevent by Understanding the Motivation

Food Quality	Food Fraud EMA	Motivation Gain: Economic
Food Safety	Food Defense Wide-scale Terrorism	Harm: Public Health, Economic, or Terror
Unintentional	Intentional	
Action		

Source: Adapted from: Spink (2006), The Counterfeit Food and Beverage Threat, Association of Food and Drug Officials (AFDO), Annual Meeting 2006; Spink, J. & Moyer, DC (2011) Defining the Public Health Threat of Food Fraud, Journal of Food Science, November 2011

Types of Counterfeiting ...or Consumer Product Fraud

- Adulterate
- Tamper
- Over-run
 - Licensee-Fraud (Excessive/ Post-Contract Production)
 - Re-Manufacturing/ Re-Conditioning
 - Unauthorized Refill
 - Clone
- Theft
- Diversion
 - Smuggling/ Money Laundering
 - Parallel Trade
 - Origin Laundering
- Simulation
- Counterfeit (IP)
 - Replica

Reference: Spink, J., Moyer, DC, Park, H., and Heinonen, J. (2013) [Defining the Types of Counterfeiters, Counterfeiting, Offender Organizations](#), *Crime Science Journal*, Volume 2, Number 8, pp. 1-10.

Current Global Activities: e.g. GFSI

Implementation of Food Fraud Mitigation 落实食品造假缓解措施



www.FoodFraud.msu.edu

© 2015 Michigan State University

Copyright use approved

20

www.FoodFraud.msu.edu

© 2015 Michigan State University

47

Action:

- Next presentation

SEE NEXT VIDEO

3 b. US Law

Review

US RELATED LAWS AND REGULATION – *UPDATE 9/2016*

US Laws and Regulations:

FSMA & Food Drug & Cosmetics Act

- At the time of this grant (October 2012 to June 2013), Food Fraud/ EMA was under the scope of the FDA Food Defense group. The FSMA Intentional Adulteration (IA) section has refined the scope to only traditional 'Food Defense' to only 'catastrophic events' – essentially large scale and terrorist attacks.
- Food Fraud/ EMA is now in the FSMA Preventative Controls (PC) – which is more traditional Food Safety.
- The FSMA-PC final rule is published but there have been no additional guidelines or training on regulatory compliance.
- Food Drug & Cosmetics Act (FDCA): “Adulterated Foods” and “Misbranded Foods”
 - Q: if there is Economically Motivated **Adulteration** should there also be Economically Motivated **Misbranding**?
 - ...other regulations that apply to companies... smuggling, tampering, theft, counterfeiting, and securities/ financial reporting (Sarbanes-Oxley... ask your CFO)

Food Safety Modernization Act (FSMA)

Original “Intentional Adulteration” text

- 11 Mentions of “Intentional Adulteration”
- Section 106. Protection against intentional adulteration
 - “103 (1) identify and evaluate known or reasonably **foreseeable hazards** that may be associated with the facility...
 - (2) identify and evaluate hazards that may be **intentionally introduced**, including by **acts of terrorism**...
 - (3) develop a **written analysis of the hazards**.”
 - “106 (b)(1) [HHS w/ DHS & USDA]... shall issue guidance documents related to protection against the intentional adulteration of food, including mitigation strategies or measures to guard against such adulteration as required under section 402 of the FD&C...”
 - “106(a)(1)(C) determine the types of **science-based mitigation strategies or measures** that are necessary to protect against the **intentional adulteration** of food.”

FSMA-IA Rule and Food Defense

- *Food Defense (FSMA-IA) is defined by the IA rule only includes “wide scale [human] health harm.”*
- *Requires the “Food Defense Plan Builder”*
- *Food Fraud/EMA is under FSMA-PC.*



FSMA-PC Rule and Food Fraud/EMA

Conclusions

1. Must address Food Fraud/EMA that could lead to a health hazard
2. FSMA-PC Rule is **not** the only Food Fraud regulation
3. It appears that current broad Food Fraud Vulnerability Assessment and Food Fraud Prevention Plan activities will lead to compliance with FSMA-PC regarding Food Fraud/EMA



Preventive Controls for Human Foods Qualified Individual Training: *PCHF-QI*

- Scope: All hazards regardless of the source
- Action: Assessment and control plan

Preventative Controls for Human Foods
Qualified Individual Training

Chapter 5
**CHEMICAL, PHYSICAL AND ECONOMICALLY
MOTIVATED FOOD SAFETY HAZARDS**

Chapter 5B
"Economically-Motivated Food Safety Hazards"
(Food Fraud)
Monday, May 9, 2016 – 3:00 to 3:30 PM
John Spink, PhD
Director & Assistant Professor
Food Fraud Initiative, Michigan State University
SPINKJ@msu.edu www.FoodFraud.MSU.edu



Video Link
(Full Version)

Chapter 5

FSP

Chemical, Physical and Economically Motivated Hazards Summary

- Chemical (including radiological) and physical hazards may occur in foods
- Hazards, if not prevented and controlled, may seriously affect food safety
- Companies must know about hazards that may be in their products
- Preventive controls for hazards requiring them must be documented in the Food Safety Plan

INSIGHT: All hazards regardless of the source

Chapter 5

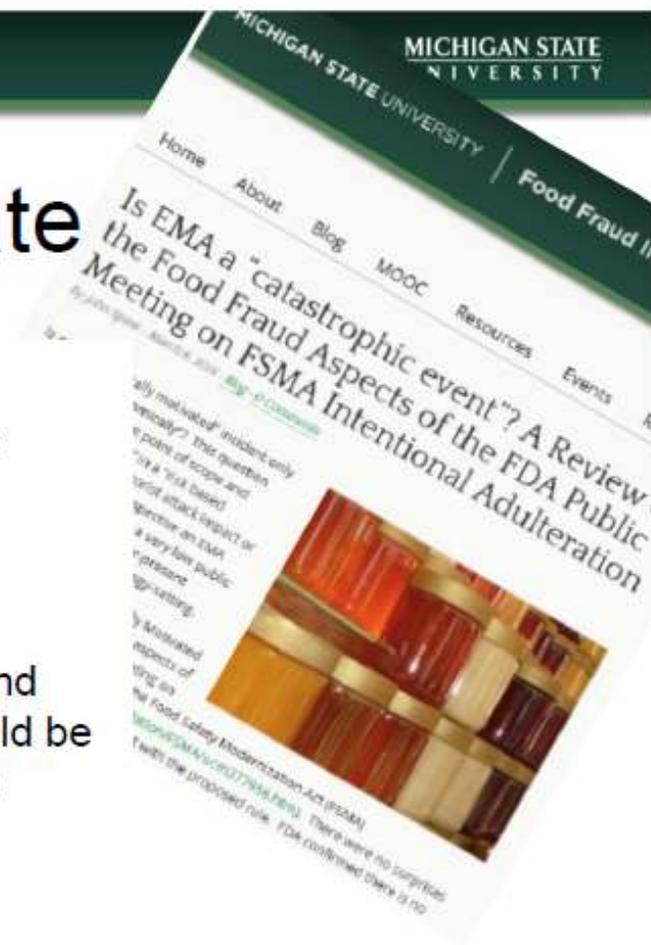
FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

29

FSMA IA Update

Public Meetings 2013/2014

- IA narrows to only “catastrophic event” (traditional Food Defense, terrorism)
- Disgruntled employees and EMA to Preventative Controls
- FDA is seeking comments on where and how EMA (including Food Fraud) should be addressed (Final PC Rule published in September 2015)



FSMA-PC Rule and Food Fraud/EMA

Keyword Search

The keyword search quickly conveys how much attention is given to FF/EMA in the FSMA-PC Final Rule. The Human Foods document contains 906 pages and the Animal Foods document has an additional 666 pages. Overall there are over 470,000 words in the two Final Rule documents. Listed below are keywords associated with FF/EMA including the number of times they are mentioned in the two documents.

- *Reasonably Likely to Occur*: 21 mentions
- *Reasonably Foreseeable Hazard*: 123 mentions
- *Fraud or Fraudulent*: 12 mentions
 - (Food Fraud: 0 mentions)
- *Economically Motivated Adulteration*: 40 mentions
 - (“EMA”: 0 mentions)
- *Adulteration*: 140 mentions
- *Adulterated*: 202 mentions
 - (*Adulterant*: 0 mentions)



Action:

- Next presentation

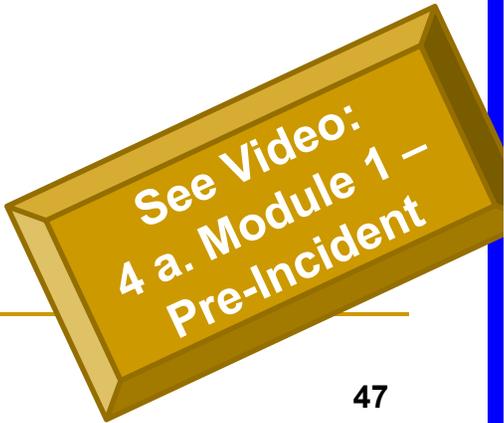
SEE NEXT VIDEO

4 a. Module 1 – Pre-Incident

Module 1: Pre-Incident

Introduction

9:30 to 10:00



See Video:
4 a. Module 1 –
Pre-Incident

Module 1: Pre-Incident

- Presentation of Scenario
- Work Session (in breakout groups)
 - Answering Questions
- Module Debrief (whole group, after break)
 - Report out with Q&A

Module 1: Pre-Incident, cont.

- A consumer complaint about “bad smoked fish” triggers a routine inspection at **Brad’s** Convenience store, **Gaylord, Michigan**.
- The food inspector finds packages of smoked whitefish. The label says: “**Doug’s** Lake Superior Smoked Whitefish - 4500 Airpark Blvd, **Duluth, Minnesota**”
- The packages appear intact, are being held at temperature, and are within the sell-by date.

Module 1: Pre-Incident, cont.

- The packaging said it was Lake Superior Whitefish but it looked odd – the inspector was familiar enough with fish to recognize that these fish were not whitefish. They looked like tilapia.
- The inspector noted other concerns in the store, including discolored red meat that appeared to have been refrozen, and some packaged candy on the counter that did not have English language labeling.
- The convenience store manager said all of these items were purchased from **John's** Distribution Warehouse, **in Michigan**, a few miles away.

Module 1: Pre-Incident, cont.

- The inspector knew the area and knew that the **John's** warehouse location was not licensed.
- The inspector issues a seizure order for the fish, meat, and candy not labeled in English and collects a sample of each.
- The inspector calls her supervisor, who was at a food safety conference, and relays what she has found.
- The supervisor knows his **Minnesota** counterpart, who is at the same conference, and provides the background on the smoked fish label.

Break

10:00 to 10:15

Module 1: Pre-Incident

Table Activity Session

10:15 to 10:45

Module 1: Table Activity Session

1. Consider the developments while answering assigned questions
2. Identify any additional requirements, critical issues, decisions, and questions you think should be addressed at this time
3. Include 1 – 3 main points gathered at your table, from the assigned questions or participant questions
4. Plan to briefly report out your roles/responsibilities to date in this scenario

Open Questions For All Groups

1. Is there a public health threat? Would this be shared with public health? When? How?
2. What type of Food Fraud is possibly occurring?
3. Should this be reported? To whom? When?
4. What should happen to the samples?
5. What is the legal authority for a seizure?

Module 1: Pre-Incident

Whole Group Recap

10:45 to 11:00

Action:

- Conduct the activity then to next section

SEE NEXT VIDEO

4 b. Module 2 – Early-Incident

Module 2: Early Incident

Introduction

11:00 to 11:15



Module 2: Early Incident

- Presentation of Scenario
- Work Session (in breakout groups)
 - Answering Questions
- Module Debrief (whole group, after break)
 - Report out with Q&A

Module 2: Early Incident

- The Department had only received the single consumer complaint, and there were no reported illnesses related to the fish, meat, or candy at the time.
- The food safety official from *Minnesota* has called back to their office regarding the smoked fish.
- *John's* Distribution Warehouse is located within the inspector's district, and the inspector proceeds to the facility.

Module 2: Early Incident

- At **John's**, the inspector introduces herself and asks for the person in charge.
- The inspector can see a bank of coolers as well as pallets of food products, including:
 - More of the candy not labeled in English
 - National brand infant formula
 - Chain store brand canned vegetables
- In the corner, two people appear to be filling small plastic bags with spices or seasoning.
- There is also a label printer.

Module 2: Early Incident

- A man appears and identifies himself as John. The inspector asks John if he was aware he needed a food license. John apologizes and asks if he can pay for one immediately.
- John also asks if there is something wrong. The inspector says there was complaint about smoked fish being sold at **Brad's** Convenience store, and says that Brad's received it from this location.

Module 2: Early Incident

- The inspector asks if they have any of the fish, and John says yes, in the cooler. There are many more similar packages of fish in the cooler, along with more of the same kind of discolored red meat. The inspector asks John if he knows what whitefish looks like.
- At this point, John starts becoming agitated and mutters ***“I knew that crook Doug was ripping me off!”***

Module 2: Early Incident

Table Activity Session

11:15 to 11:45

Module 2: Table Activity Session

1. Consider the developments while answering assigned questions
2. Identify any additional requirements, critical issues, decisions, and questions you think should be addressed at this time
3. Include 1 – 3 main points gathered at your table, from the assigned questions or participant questions.
4. Plan to briefly report out your roles/responsibilities to date in this scenario.

Open Questions For All Groups

1. What should the inspector do next?
2. Are there potential public health threats? How would we know?
3. What are the potential issues with each of those products?
4. What potential food frauds exist at this point?
5. Would you report it? To whom? When? How?

Module 2: Early Incident

Whole Group Recap

11:45 to Noon

Lunch

Noon to 1:00

Action:

- Conduct the activity then to next section

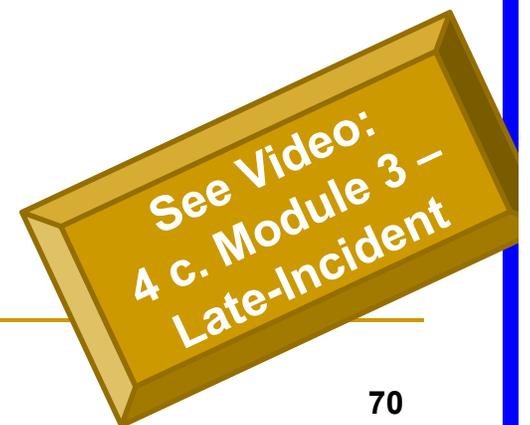
SEE NEXT VIDEO

4 c. Module 3 – Late-Incident

Module 3: Late Incident

Introduction

1:00 to 1:15



Module 3: Late Incident

- Presentation of Scenario
- Work Session (in breakout groups)
 - Answering Questions
- Module Debrief (whole group, after break)
 - Report out with Q&A

Module 3: Late Incident

- The inspector has gone back to her car and called her supervisor. The supervisor calls the nearest inspector to have her also go to **John's**. He then calls his supervisor in **Lansing, Michigan**.
- He also tells his **Minnesota** colleague at the conference that this may be a bigger issue and that **Doug's** may soon know that the labeling is being looked into.

Module 3: Table Activity Session

1. Consider the developments while answering assigned questions
2. Identify any additional requirements, critical issues, decisions, and questions you think should be addressed at this time
3. Include 1 – 3 main points gathered at your table, from the assigned questions or participant questions.
4. Plan to briefly report out your roles/responsibilities to date in this scenario.

Open Questions For All Groups

1. **At what point does it become dangerous for the food inspector?** When should law enforcement be engaged and at what level?
2. Where does the safety of the inspector fit into law enforcement's priorities? Do the possibility of multiple fraud impact this?
3. What are the legal options for the Department?
4. What steps should the Department be taking?

Module 3: Late Incident

Table Activity Session

1:15 to 1:45

Module 3: Late Incident

Whole Group Recap

1:45 to 2:00

Break

2:00 to 2:15

Action:

- Conduct the activity then to next section

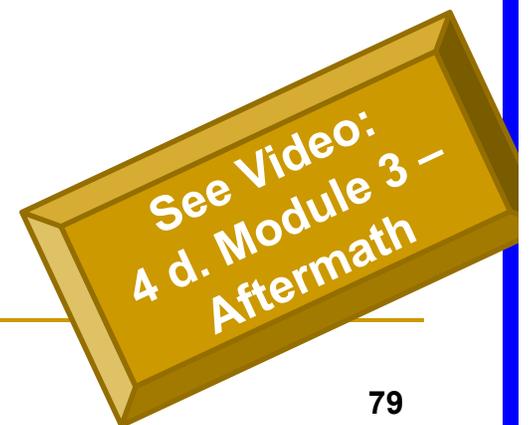
SEE NEXT VIDEO

4 d. Module 3 – Aftermath

Module 4: Aftermath

Introduction

2:15 to 2:30



Module 4: Aftermath

- Presentation of Scenario
- Work Session (in breakout groups)
 - Answering Questions
- Module Debrief (whole group, after break)
 - Report out with Q&A

Module 4: Aftermath

- The Department has coordinated with law enforcement and has control of the warehouse. Multiple food inspectors are on the scene reviewing labels and records.
- Notifications of other agencies are occurring.

Open Questions For All Groups

1. As the Department realizes that products within the warehouse are misbranded, mislabeled, stolen, counterfeit, and smuggled into the country, what should it do to address each of these situations?
2. Which other agencies should be involved?
3. What role does law enforcement play now?
4. When would the industry / brand owners be notified?
5. What would the public and the media be told?

Module 4: *Aftermath*

Table Activity Session

2:30 to 3:00

Module 4: Aftermath

Whole Group Recap

3:00 to 3:15

Action:

- Conduct the activity then to next section

SEE NEXT VIDEO

5. Closing

Evaluation and Closing Comments

3:15 to 3:30

Module Review

- Complex issue for many reasons
- Lack of clarity of reporting or jurisdiction
- Concerns of physical safety
- The lack of transparency that allows the Food Fraud to occur also is a vulnerability for food related attacks.
- In the absence of evidence of an attack, who gets contacted and why?

Insights from Reports

- ***Is there a threat of violence to inspectors?***
- ***When should law enforcement officers be involved?***
- What was learned from the series of suspicious activity reports?
- What is a best practice to gathering information on Food Fraud?
- For an incident
 - What would happen?
 - What should happen?
 - How can that be enabled?

Adjourn

3:30

Appendix

Suspicious Activity Reports

Who hear what when and what did they do with the intel?

Supplemental Material

Suspicious Activity Reports

Concept of how info comes in and what we do with it (use TTX as example)

- Scenario 1: A citizen calls the Fusion Center
- Scenario 2: A food inspector spots something “odd” (e.g. the Free-B scenario)
- Scenario 3: A citizen calls the State food safety agency’s 800#
- Scenario 4: A citizen complains to retailer

Action:

- Conduct the activity then to next section

SEE NEXT VIDEO

6. Industry

Review

INDUSTRY AND GOVERNMENT ACTIVITIES – *UPDATE 9/2016*

Industry Standards, Certification, and Guidance: GFSI & SSAFE

- Global Food Safety Initiative (GFSI) is an industry-led group that focuses on strengthening and harmonizing food safety management systems. (www.myGFSI.com)
- Safe Supply of Affordable Food Everywhere (SSAFE) group is an industry-led group that focused broadly on food production and food safety issues including providing enough food for the planet (www.ssafe-food.org)
- Attached summarizes GFSI and SSAFE work related to Food Fraud. GFSI endorsed the SSAFE Food Fraud guidance which led to a Food Fraud Vulnerability Assessment.

GFSI China Focus Day - 3 November 2015 | BEIJING
CIFSQ Conference- 5 November 2015 | BEIJING

Summary
for FFTX

Cross Industry Development
of
**Food Fraud
Vulnerability
Assessment Tool**

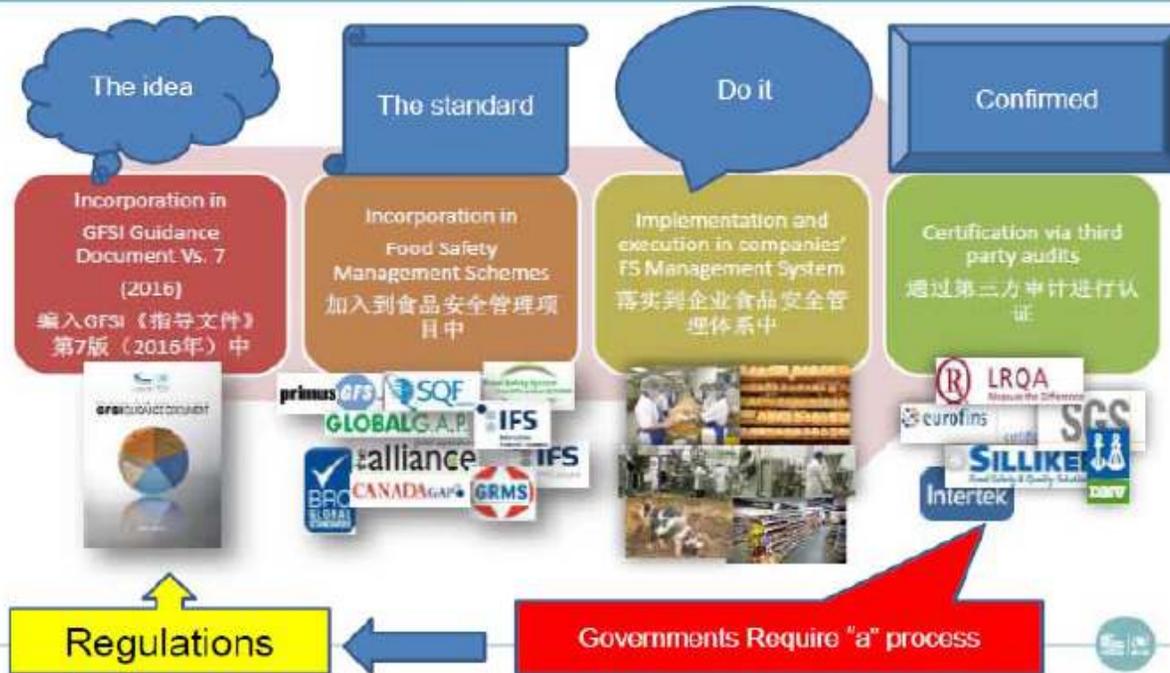


Petra Wissenburg

Food Safety External Affairs & Strategic Projects Director DANONE
GFSI Board Member, SSAFE Board Member

THE GLOBAL FOOD SAFETY INITIATIVE

Implementation of Food Fraud Mitigation 落实食品造假缓解措施



www.FoodFraud.msu.edu

© 2015 Michigan State University

Copyright use approved

20

www.FoodFraud.msu.edu

© 2015 Michigan State University

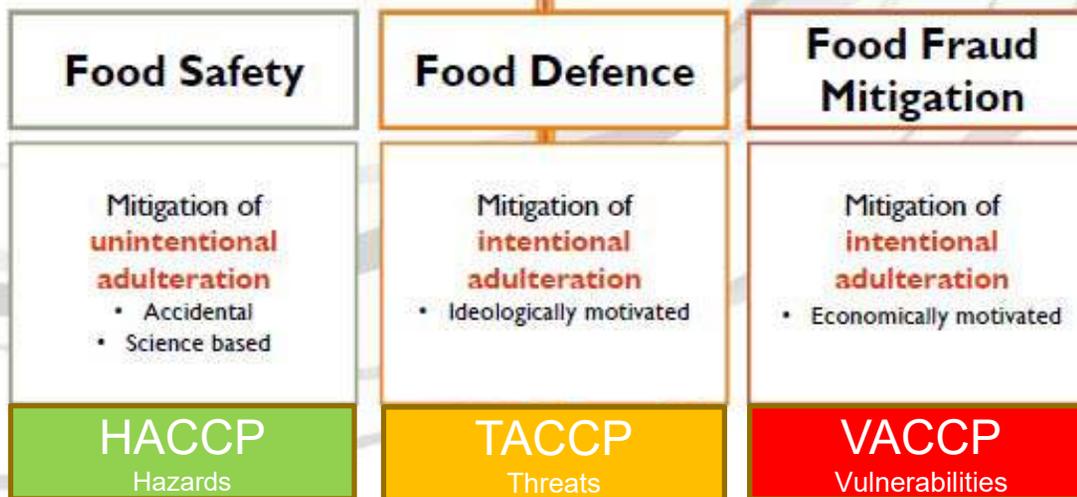
47



GFSI: FF Mitigation as Integral Part of FSMS



Summary
for FFTX



THE GLOBAL FOOD SAFETY INITIATIVE



Key Elements for FF Mitigation



Summary for FFTX



Name	Requirement
Food Fraud Vulnerability Assessment	<p>The standard shall require that the organisation have a documented food fraud vulnerability assessment procedure in place to identify potential vulnerability and prioritise food fraud mitigation measures.</p>
Food Fraud Mitigation Plan	<p>The standard shall require that the organisation have 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.</p> <p>This plan shall cover the relevant GFSI scope and shall be supported by the organisation's Food Safety Management System.</p>

THE GLOBAL FOOD SAFETY INITIATIVE



Food Fraud Vulnerability Assessment Tool

SSAFE 

Summary
for FFTX

Practical Tool



Help companies
undertake a vulnerability
assessment



Help companies prepare a
plan to mitigate the
identified vulnerabilities



SSAFE 

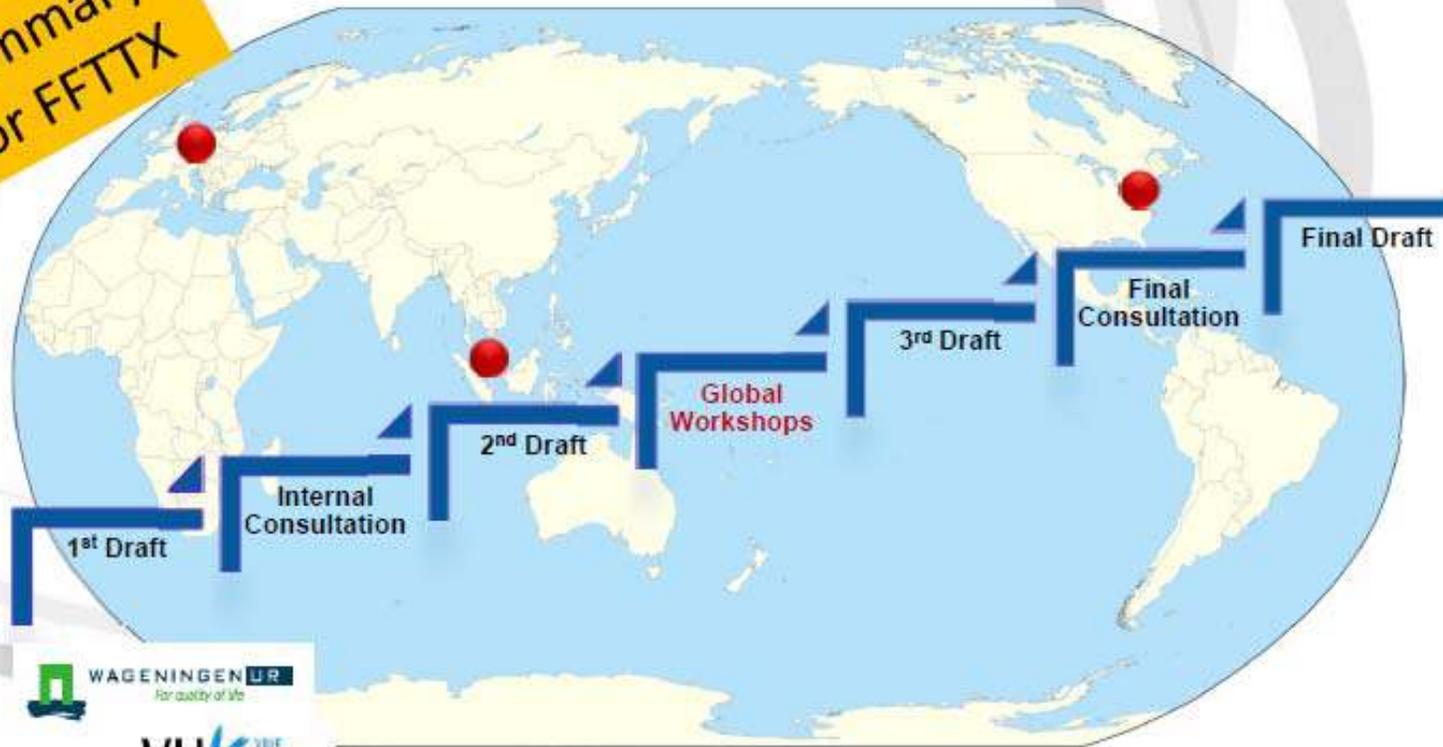
THE GLOBAL FOOD SAFETY INITIATIVE



FFVA Tool Development Timeline



Summary
for FFTX



THE GLOBAL FOOD SAFETY INITIATIVE



SSAFE Tool Launch Schedule

SSAFE

Summary
for FFTX



THE GLOBAL FOOD SAFETY INITIATIVE



Review

GLOBAL ACTIVITY – CHINA & EUROPE

Day One

Food Fraud

what it is, why it is important, why now

Food Protection Forum
 Ministry for Primary Industries, NZ
 Monday, October 12, 2015
 Session 2 - Food Culture, 12:45 to 1:10
 Auckland, New Zealand

John Spink, PhD
 Director & Assistant Professor, Food Fraud Initiative
 Twitter @FoodFraud and @FoodFraud

www.FoodFraud.MSU.EDU

China: Food Safety Law

中华人民共和国食品安全法

(Baltimore, USA)

IFT15
 White Paper: Food Innovation

Strategies for Ensuring Food Safety of Chinese Products - fight against food fraud

Jurahi Chen
 China National Centre for Food Safety Risk Assessment

China Regulation and Perspectives to Address Food Fraud and Modified Ingredients Addition

2015
 2015年10月12日

Food Fraud Incident Type

- Substitution:** Replacement of finished product or ingredients
- Tampering:** product and packaging are used in a fraudulent way
- Identity:** legitimate product is made in breach of production agreements
- Theft:** legitimate product is stolen and passed off as legitimate product
- Impersonation:** The sale or distribution of legitimate products outside of intended market
- Manufacture:** illegitimate product is designed to look like food and passes as the legitimate product
- Contamination:** All aspects of the finished product and packaging are contaminated

Food Fraud Incident Type

- Substitution:** Replacement of finished product or ingredients
- Tampering:** product and packaging are used in a fraudulent way
- Identity:** legitimate product is made in breach of production agreements
- Theft:** legitimate product is stolen and passed off as legitimate product
- Impersonation:** The sale or distribution of legitimate products outside of intended market
- Manufacture:** illegitimate product is designed to look like food and passes as the legitimate product
- Contamination:** All aspects of the finished product and packaging are contaminated

UK Elliott Independent Review of Food Fraud

- The importance of a systems approach and preventative measures – which is consistent with the EU draft resolution on Food Fraud, the USA FDA and the USA Congressional Research Service report.
- Expanding the research focus from detection to collaborative prevention.
- Consistent with many reports from around the world and from research, the report reiterates that Food Fraud is a unique threat that requires specific attention.
- Specific Recommendation: Food Crime Unit



Discussion and Conclusion

■ Brad Deacon, JD

- Emergency Management & Administrative Law Coordinator
- Michigan Department of Agriculture and Rural Development (MDARD)
- DeaconB9@Michigan.gov <http://www.Michigan.gov/mdard>

■ John Spink, PhD

- Director & Assistant Professor, Food Fraud Initiative
- Michigan State University (MSU)
- SpinkJ@msu.edu, <http://FoodFraud.msu.edu>

■ Doug Moyer, PhD

- Researcher, Food Fraud Initiative, MSU
- Assistant Professor, Program in Public Health, MSU
- MoyerDo1@msu.edu

END

Content for 5-minute overview

See Video:
7. OVERVIEW

Food Fraud Table Top Exercise (FFTTX)



Something's Fishy

FDA's Innovative Food Defense Program (IFDP)
Grant Deliverable

June 18, 2013 *(Updated March 1, 2015, Ongoing)*
East Lansing, Michigan

Original Program: MDA & MSU



Michigan Department of
AGRICULTURE
& Rural Development

MICHIGAN STATE UNIVERSITY

Food Fraud Table Top Exercise (FFTTX)

Something's Fishy



FDA's Innovative Food Defense Program (IFDP)
Grant Deliverable
June 18, 2013
East Lansing, Michigan

Introduction

- **Brad Deacon, JD**
 - Emergency Management & Administrative Law Coordinator
 - DeaconB9@Michigan.gov <http://www.Michigan.gov/mdard>
- **John Spink, PhD**
 - Director, MSU Food Fraud Initiative
 - SpinkJ@msu.edu, <http://FoodFraud.msu.edu>
- **Doug Moyer, PhD**
 - Researcher, MSU Food Fraud Initiative
 - MoyerDo1@msu.edu

9:00 to 9:30



Michigan Department of
AGRICULTURE
& Rural Development

MICHIGAN STATE UNIVERSITY

DHHS/FDA Innovative Food Defense Program Grant (PAR-12-116) Michigan Department of Agriculture Sub-Contract to Michigan State University.

- Principle Investigator: Brad Deacon/MDA,
- MSU Principle Investigator: John Spink, Co-PI: Douglas Moyer.

FDA FREE-B Program

- FDA.gov, Free-B Overview
- (pre-FSMA definition of Food Defense that included economically motivated adulteration)
- <http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm295902.htm>

The image displays a screenshot of the FDA website's 'Food Related Emergency Exercise Bundle (FREE-B)' page. The page header includes the FDA logo and navigation links for various product categories. The main content area features a sidebar with 'Tools & Educational Materials' such as 'Food Defense Acronyms, Abbreviations & Definitions' and 'Food Defense Plan Builder'. The central text describes the FREE-B as a compilation of scenarios for food emergency response, developed in cooperation with the CDC and USDA. A video player is embedded on the page, showing a man in a suit, identified as Jason Bashura, General Health Scientist at the Office of Food Defense, Communication and Emergency Response, FDA. The video player shows a play button and a progress bar at 0:40 / 2:13.

U.S. Food and Drug Administration
Protecting and Promoting Your Health

Home > Food > Food Defense > Tools & Educational Materials

Food Related Emergency Exercise Bundle (FREE-B)

Watch the FREE-B Informational Video

DOWNLOAD FREE-B

The Food Related Emergency Exercise Bundle (FREE-B) is a compilation of scenarios based on and unintentional food contamination events. It is designed with the intention of assisting DOH and public health agencies in assessing existing food emergency response plans, protocols, and procedures that may be in place, or that they are in the process of revising or even developing. The FREE-B includes scenarios for multiple jurisdictions and organizations (medical community, private sector, law enforcement, and other communities) to 'play' with the host agency, or, quite simply, for an individual agency to use as a model for their own protocols and procedures independently.

FDA developed FREE-B in cooperation with the Centers for Disease Control and Prevention (CDC) and the Department of Agriculture's Food Safety Inspection Service (FSIS) and Animal and Plant Health Inspection Service (APHIS). Additionally, numerous subject matter experts participated in various rounds of review.

The FREE-B is a set of eight (8) scenarios, each of which contains a Facilitator's Guide.

Jason Bashura
General Health Scientist
The Office of Food Defense, Communication and Emergency Response, FDA

MICHIGAN STATE UNIVERSITY

www.FoodFraud.msu.edu

112

FREE-B on Food Fraud

- 72 participants in Lansing, Michigan; on-line team in Minnesota Department of Agriculture (MDA) and NCFPD
- Representatives from Federal, State, Local, Industry, and Academia; Enforcement, Public Health, and Regulators.
- Also conducted at IFT and NEHA



Agenda

- Welcome and Overview
 - Introduction
 - Food Fraud Review
 - Law & Regulations *(Updated)*
- Module 1: Pre-Incident (Exercise, & Recap)
- Module 2: Early Incident
- Module 3: Late Incident
- Module 4: Aftermath
- Evaluation and Closing Comments
- Added:
 - Global Industry and Government Activities *(Updated)*

Open Questions For All Groups (Selected)

1. What should the inspector do next?
2. Are there potential public health threats?
3. Would you report it? To whom? When? How?
4. Which other agencies should be involved?
5. What role does law enforcement play now?
6. When would the industry / brand owners be notified?
7. What would the public and the media be told?

END

APPENDIX DO NOT NEED