

#### We warmly welcome you to:

## **The Future of Food Safety**

Thursday 18 May 2017



Conference Producer: Chris Reynolds Chair: Sarah Delaney #SafetyofFood @SalfordUni\_SPD @C\_Reynolds91



# Chair Sarah Delaney

# UK & IE Law and Standards Manager IKEA Ltd



### **Keynote Address**

# **Professor Carol A Wallace**

Professor of Food Safety Management Systems, Co-Director, Institute of Nutritional Sciences and Applied Food Safety Studies **University of Central Lancashire** 

Impact of Food Safety Culture on Food Safety Management Systems

**Prof Carol Wallace** 

University of Central Lancashire

# Agenda

- Food safety research at UCLan
- Evolution of Food Safety Management Systems
- Food safety paradox increasing illness
- Findings from HACCP and Food Safety Research
- Emergence of food safety culture
- Food Safety Culture Who's who and What's what
- Evolving food safety programmes and culture
- Measuring and improving food safety culture
- Food safety culture research
- Systems and Culture overcoming the complexity

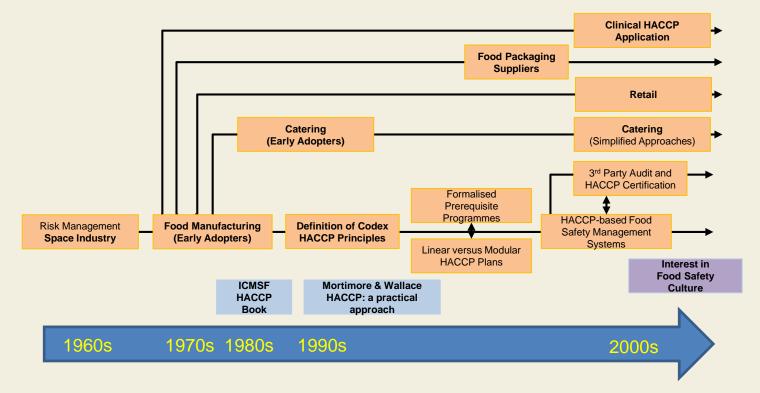


# **Food Safety Research at UCLan**



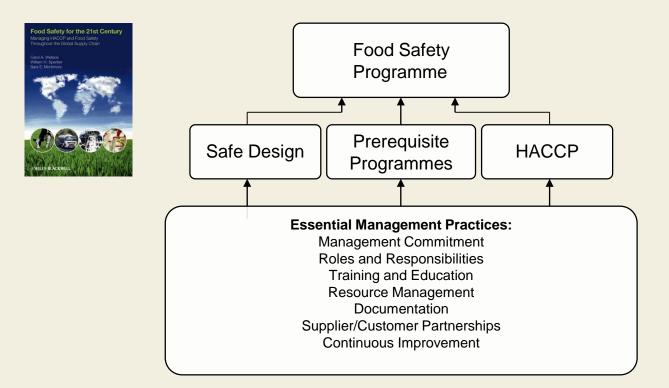


### **Evolution of HACCP-based FSMS**





# Modern Food Safety Management Systems





# Food Safety Paradox: HACCP-based FSMS use increases but...

- 2005 Cooked meats UK
  - 157 ill; 1 death; *E. Coli* O157:H7
- 2006 Chocolate UK
  - 60 ill; Salmonella Montevideo
- 2006 Spinach outbreak USA
  - 200+ ill across 26 states; 4 Dead; *E. Coli* O157:H7
- 2007 Peanut butter USA
  - 650 ill; 9 deaths Salmonella Typhimurium
- 2008 Cooked meats Canada
  - 57 ill; 23 deaths; L. monocytogenes
- 2011 Canteloupe outbreak USA
  - 147 ill across 28 states; 33 Dead; Listeria monocytogenes
- 2011 Sprouted seeds outbreak Germany
  - More than 4000 illnesses; 40 deaths; E. coli O104:H4



## Food Safety Paradox: HACCP-based FSMS use increases but...

- We still experience major food safety incidents
- Has HACCP been oversold?
- HACCP can only control identified hazards
- Many outbreaks associated with business issues
  - Lack of knowledge, expertise, awareness & commitment
  - management/leadership failures
  - Prerequisite programme failures
  - Failure to provide resources, etc.
  - Failure to properly implement, verify and maintain the system
- These are not HACCP system failures per se but something is not working....



# HACCP-based FSMS Successes and Challenges – Industry Perspectives

- Codex agreement gave us a global food safety system language
- Cross functional input to food safety and a preventative mindset
- Structures for systematic hazard analysis and CCP identification/management
- Real time in-process monitoring and recognition of the *workhorse* role of prerequisites (PRPs)

But we have ....

- Inadequate Pre-requisite programs (PRPs)
- Poorly implemented HACCP systems
- Failure to maintain systems once implemented HACCP is an afterthought



# **HACCP Research Perspectives**



Food Research International 47 (2012) 236–245 Contents lists available at ScienceDirect

Food Research International

journal homepage: www.elsevier.com/locate/foodres

Re-thinking the HACCP team: An investigation into HACCP team knowledge and decision-making for successful HACCP development

Carol A. Wallace <sup>a,\*</sup>, Lynda Holyoak <sup>b</sup>, Susan C. Powell <sup>c</sup>, Fiona C. Dykes <sup>d</sup>

<sup>a</sup> School of Sport, Tourism & the Outdoors, Division of Sport, Exercise and Nutritional Sciences, University of Central Lancashire, Preston, PR1 2HE, United Kingdom

<sup>b</sup> School of Psychology, University of Central Lancashire, Preston, PR1 2HE, United Kingdom School of Psychology, University of Central Lancashire, Preston, PR1 2HE, United Kingdom

<sup>c</sup> Academy for Health and Wellbeing, Manchester Metropolitan University, John Dalton Building, Chester Street, Manchester, M1 5GD, United Kingdom <sup>d</sup> School of Public Health and Clinical Sciences, University of Castral Langebirg, Parton, BPI, 2017, United Kingdom

<sup>d</sup> School of Public Health and Clinical Sciences, University of Central Lancashire, Preston, PR1 2HE, United Kingdom

# Food Control 35 (2014) 233–240 Contents lists available at SciVerse ScienceDirect CONTROL Food Control CONTROL

#### HACCP – The difficulty with Hazard Analysis

CrossMark

Carol A. Wallace<sup>a,\*</sup>, Lynda Holyoak<sup>b</sup>, Susan C. Powell<sup>c</sup>, Fiona C. Dykes<sup>d</sup>

<sup>a</sup> International Institute of Nutritional Sciences and Applied Food Safety Studies, School of Sport, Tourism and the Outdoors, University of Central Lancashire, Preston PR1 2HE. UK

<sup>b</sup>School of Psychology, University of Central Lancashire, Preston PR1 2HE. UK

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<sup>d</sup> School of Health, University of Central Lancashire, Preston PR1 2HE, UK

### Development of methods for standardised HACCP assessment

Carol A. Wallace and Susan C. Powell Lancashire School of Health and Postgraduate Medicine, University of Central Lancashire, Preston, UK, and

Lynda Holyoak Department of Psychology, University of Central Lancashire, Preston, UK

#### Abstract

Purpose – Assessment of HACCP systems is a key element in assuring the effective management of food safety. However, there is no accepted approach or common methodology available to HACCP practitioners, auditors or regulatory bodies. This paper seeks to examine this situation

Post-training assessment of HACCP knowledge: its use as a predictor of effective HACCP development, implementation and . maintenance in food manufacturing

> Carol A. Wallace and Susan C. Powell Lancashire School of Health and Postgraduate Medicine, University of Central Lancashire, Preston, UK, and

Lynda Holyoak Department of Psychology, University of Central Lancashire, Preston, UK



Standardised HACCP assessment

Assessment of

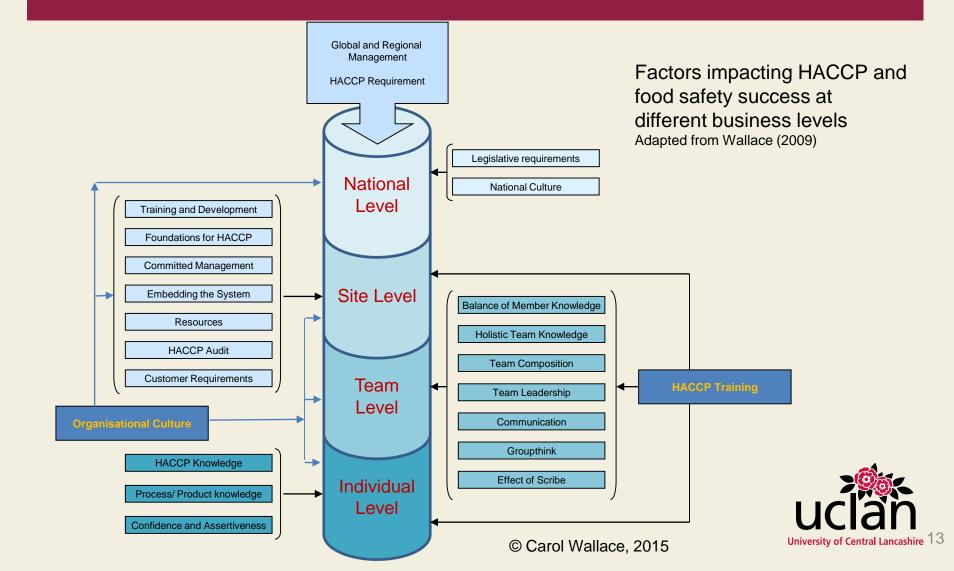
HACCP

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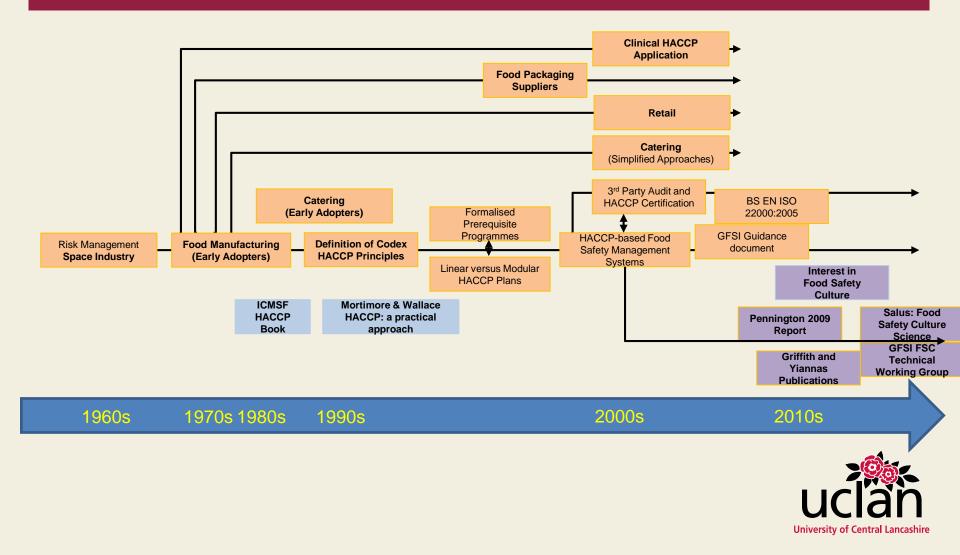
knowledge

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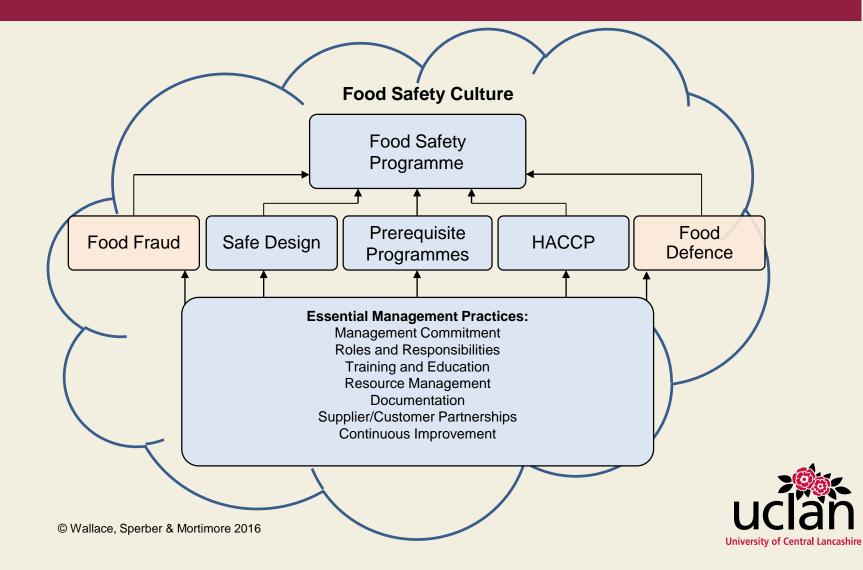
# **HACCP Research Perspectives**



## **Evolution of HACCP-based FSMS and Food Safety Culture**



# **Evolving Food Safety Management** Systems



# Where does the FSC concept come from?

- FSC builds on work from:
  - Organisational Culture
  - Organisational Psychology
  - Human Factors research
  - Safety Science
  - Social cognitive science
  - National Culture
- These are very well developed fields in their own right
- FSC needs input from a number of perspectives,
  - not just food safety people but social scientists, psychologists, ethnographers, behavioural specialists
  - Quantitative and qualitative perspectives both important.



# **What is Food Safety Culture**

- Definitions:
- Griffith, 2010 FSC =

'The aggregation of the prevailing, relatively constant, learned, shared attitudes, values and beliefs contributing to the hygiene behaviours used within a particular food handling environment'

• Schein, 2004 – Organisational Culture =

A pattern of shared basic assumptions that was learned by a group as it solved its problems. The group found these assumptions to work well enough to be considered valid and, therefore, to be taught to new members as the correct way to perceive, think and feel in relation to these problems'

Jespersen et al, 2016 – FSC =

'the interlinking of three theoretical perspectives: organisational culture, food science and social cognitive science.'



# Food Safety Culture Evolving Definitions

- Food Safety Culture: Shared values, norms, and beliefs that affect mindset and behaviours towards food safety across/in/throughout an organisation. (GFSI TWG)
- This definition builds on previous work and definitions in the literature, in particular the definitions of Griffith et al. (2010) and Schein (2004).
- Shared values, norms and beliefs generally seen as a learned pattern of conditions that are taught to new members when they join a group.



# Food Safety Culture Current Perspectives (Who's who & What's what)





The Food Safety Culture Science Group



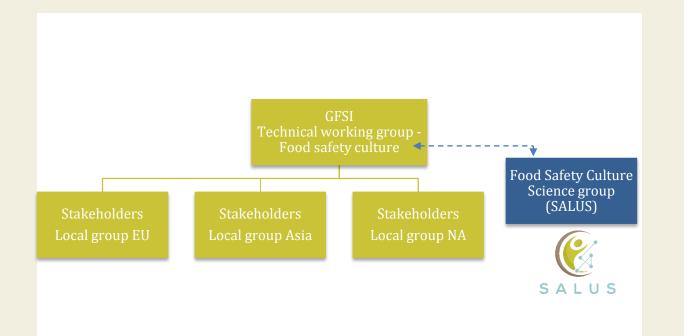








# **GFSI/Science Group Food Safety Culture Initiative**





# **GFSI Food Safety Culture Technical Working Group (TWG)**

- Aim: to provide guidance and requirements around food safety culture.
- Consists of practitioner technical experts from retailers, manufacturers, food service operators, service providers, standard owners, certification bodies, and industry associations.





# **GFSI Technical Working Group FSC**

- Established following discussions 2015-16 http://www.mygfsi.com/news-resources/news/449-gfsi-ramps-up-work-on-food-safety-culture.html
- First meeting Berlin, 2016
- Challenges and opportunities in FS-culture
- FS-culture items (discussion on drivers/challenges, tools & best practices)
  - Policy, strategy, vision
  - Education, training & learning
  - CEO communication
  - Working group/communication
  - Hazards understanding across all employees
  - Performance measurements/tools





# Food Safety Culture Science Group (SALUS)

- Academics from 11 Universities, 1 Industry Research Association
- Consultants linked with research institutes (Consultant/Academics)
- International Group
  - UK, Netherlands, Belgium, Canada, USA, Zimbabwe
- Multiple perspectives
  - Food safety, systems theory, psychology, human factors, team behaviour, leadership, decision-making, measurement tool development, etc.
- Chaired by Prof Carol Wallace, UCLan
- Group first met November 2015
- 2<sup>nd</sup> Meeting June 2016; 3<sup>rd</sup> Meeting Jan 2017
- Next Meeting November 2017





### The need to assess of food safety culture

Culture factors.. (Griffith et al. 2010)

- Food safety management systems and style;
- Food safety leadership;
- Food safety communication;
- Food safety commitment;
- Food safety environment; and
- Risk perception



# So, how do I measure FSC?

- A number of tools are available, e.g.
  - Taylor (2015) Campden BRI/Taylor Shannon
  - Jespersen et al (2016) Maturity Profiling and online survey tool
  - De Boeck et al (2015) Food Safety Climate self-assessment tool
  - Wright et al (2013) FSA Toolkit
- Problems
  - All measuring slightly different things in different ways
  - Need to understand validity and application of tools.



## How do food safety culture evaluation tools bring breadth and depth to the assessment, management and evolution of food safety culture?

	Food Control 79 (2017) 371–379	
	Contents lists available at ScienceDirect	CONTROL CONTROL FOOD CONTROL
	Food Control	CONTROL CONTROL CONTROL CONTROL Defense and and defense CONTROL
ELSEVIER	journal homepage: www.elsevier.com/locate/foodcont	

#### Comparative analysis of existing food safety culture evaluation systems



#### Lone Jespersen<sup>a,\*</sup>, Mansel Griffiths<sup>a</sup>, Carol A, Wallace<sup>b</sup>

<sup>a</sup> University of Guelph, 50 Stone Road East, Guelph, ON N1G 2M7, Canada <sup>b</sup> University of Central Lancashire, International Institute of Nutritional Sciences and Applied Food Safety Studies, Preston, Lancashire PR1 2HE, United Kingdom

#### ARTICLE INFO

ABSTRACT

Article history: Received 12 December 2016 Received in revised form 20 March 2017 Accepted 23 March 2017 Available online 27 March 2017

Keywords: Food safety culture Research quality Trustworthiness Cultural dimensions Culture evaluation

The purpose of the research was firstly, to analyze existing culture evaluation systems for commonalities and differences in research quality, applied validation strategies, and content. Secondly, to suggest a simple structure of food safety cultural dimensions to help unify the culture evaluation field. To achieve these goals, a comparison of eight culture evaluation models applied to varing degrees in the food industry was conducted. The systems were found to vary significantly in applied validation strategies but through deductive, textual data analysis, five dimensions were identified that cover elements present in all the models. Transparency is needed when using applied research methodologies to continually increase quality and trustworthiness of culture research in the food safety domain and this field would benefit from both further commonality of approach to validation strategy and structure and adoption of an overarching structural framework.

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### **Comparing culture evaluation systems**

Constructs	Indicators	Traits	Drivers	Capability area	Markers	Categories	Elements
(Ball)	(De Boeck)	(Denison)	(CEB)	(Jespersen)	(NSF)	(TSI)	(Wright)
Management	Leadership	Mission	Leadership	Perceived Value	Culture and	Purpose	Perception of
commitment			emphasis		Awareness		safety
Supervisor commitment	Commitment	Involvement	Message credibility	People systems	Management	People	Business priority
Training	Communication	Consistency	Peer	Process thinking	Training	Process	Leadership
			involvement				
Infrastructure			Employee	Technology	Regulatory		Ownership of
support	Resources	Adaptability	ownership	enabler	Compliance	Proactivity	safety
Worker	Risk awareness			Tools and	Policies and		Competence
commitment	hisk dindreness			infrastructure	standard		competence
Worker					Auditing		Employee
behaviours					Autung		communication
					Tressel		Employee
					Traceability		involvement
					IT Systems		Risk perception

L. Jespersen et al. / Food Control 79 (2017) 371–379

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Fig. 2. Content comparison of the eight culture evaluation systems. Five affinity groupings emerged from the analysis; red = values and mission, green = people systems, blue = consistency, yellow = adaptability, and purple = risk and hazards.

# **FSC Dimensional Framework**





# Food Safety Culture - A continuum

Food Safety Culture Maturing

Weak Negative

Measurement is not enough.. Improvement tools and mapping tools also needed to contextual characteristics Strong Positive

Identify position and level of maturity

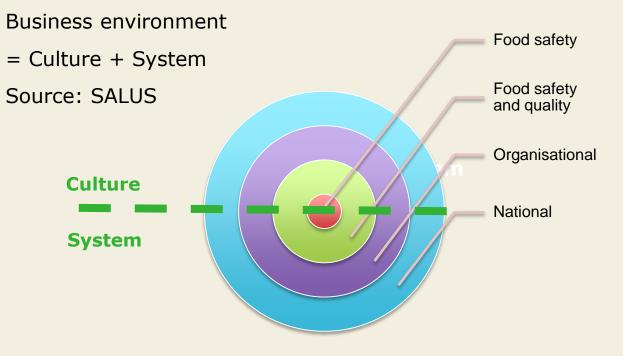
Criteria being assessed (varies by tool)

Food Safety Culture Measurement Tools





### **Food Safety and Culture in Business**







# **Salus framework**



- What underpins the framework?
- How can it be relevant to all organisations and food manufacturing settings?
- Characteristics ...
  - Individual characteristics
  - Group characteristics
  - Internal business context characteristics
  - External business context characteristics



# How do I improve FSC?

- Will require a toolkit of options depending on existing state
- Examples include:
  - Team building approaches and people development
  - Application of behavioural theories and interventions
  - Application of systems theories and interventions
  - Clarification of vision and strategy and linking to what leaders actually do and say
  - Provision of necessary resources, structures, systems and equipment to enable an effective culture.
- Will require research and sharing.





## **Food Safety Culture** ...Challenges, opportunities, and research





# Thank you.....

# **Questions?**

#### Professor Carol A Wallace Professor of Food Safety Management Systems

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cawallace@uclan.ac.uk

(References List available on request)







# **Dr Peter Wareing**

# Food Safety and Manufacturing Consultant Leatherhead Food Research

### leatherhead food research

Food safety risks in the supply chain Dr Peter Wareing, Food Safety and Manufacturing Consultant

18 May 2017

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# Regulatory, sensory and product development consultancy for the food and drink industry



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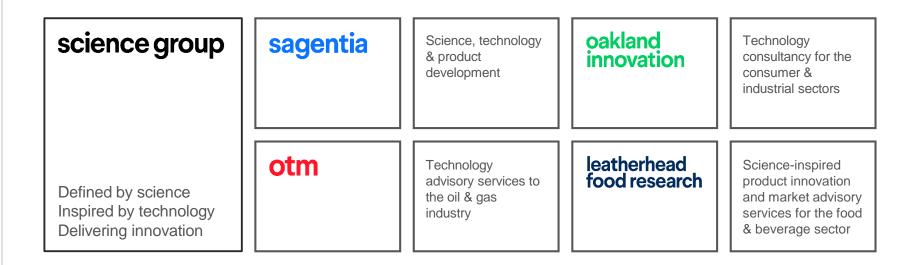
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## Solving complex challenges for the food & drink industry since 1919





## Science Group



## Outline

- 1 Introduction food safety risk factors
- 2 How to determine food safety risks
- 3 Food industry response to outbreaks and contamination
- 4 Foodborne diseases and shelf life
- 5 How to control risks
  - Learnings
  - Risk assessments
  - Awareness
  - New technologies
- 6 Conclusions

## Introduction – food safety risk factors



### Causes

### Internal

- Lack of understanding of food processes/ingredients
- Poor/no food safety culture
- Product reformulation
  - Clean labels
  - Regulatory aspects
- Safety vs price vs quality vs delivery

### External

- Globalisation
  - · Length of supply chain
  - Complexity of supply chain
  - Transparency of supply chain
- Terrorist threat
- Food fraud in relation to food safety



## How to determine food safety risks

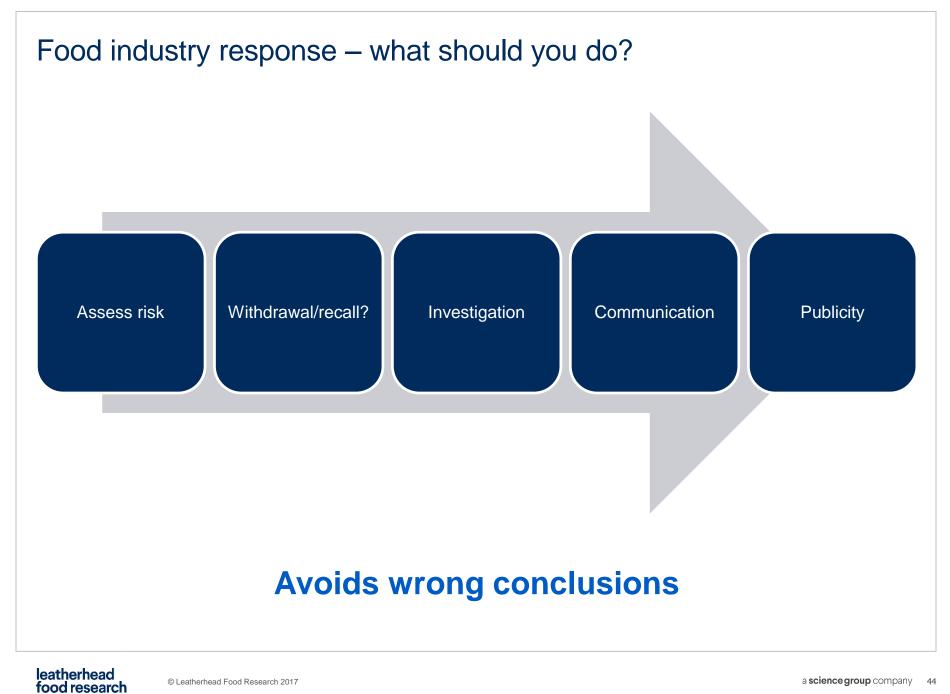
### Internal

- Know your supply chain
- Experienced staff
- Frequent audit against documented process

### External

- Perspective overview
- Information networks
  - FSA
  - RASFF
  - Horizon Scan





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## What might companies do wrong?

## Multiple recall

# Destroying the evidence

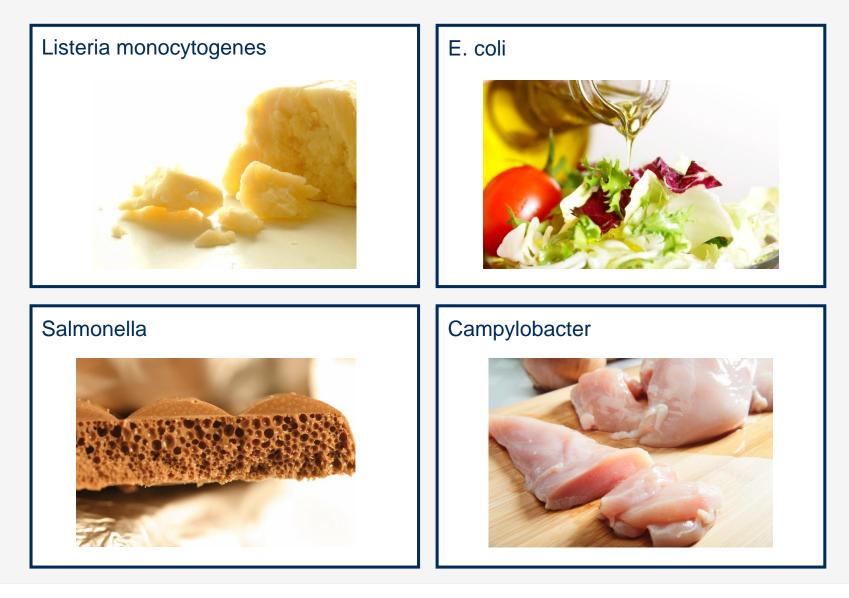


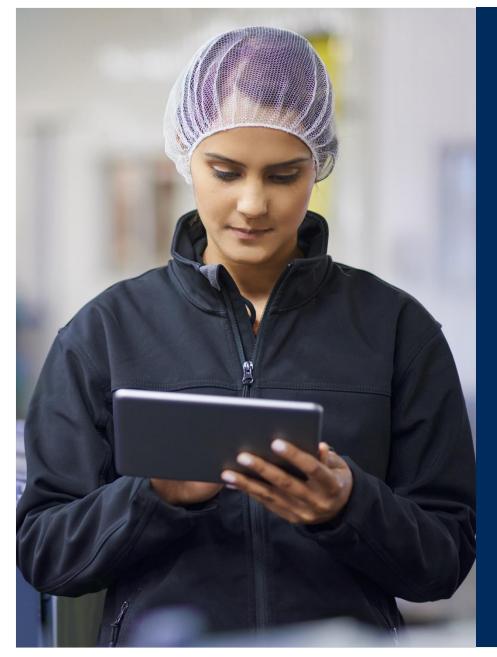




## Taking action on basis of incomplete evidence

### Foodborne diseases in the supply chain





## How to control risks

- Learnings
- Monitoring
- Awareness
- New technologies

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### Learnings

- Past mistakes
- All staff every level
- Contacts
- Knowledge of supply chain risks
- Regional issues
- Understanding of process
   controls in relation to hazards
- Map supply chain



### **Risk assessment**

### Shelf life

- Production ongoing
- Abuse trials
- Qualitative and quantitative methods

### **Audits**

- Risk rating for suppliers
  - High, medium and low risk
- Supplier self assessments
- Follow up audit frequency
- NC process
- Audits vs guidance

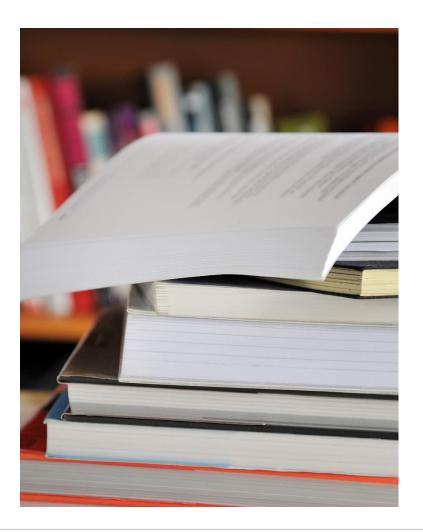
### Challenge testing

- Risk assessment and modelling
- Knowledge of process/microflora
- Interactions
- Cost
- Interpretation



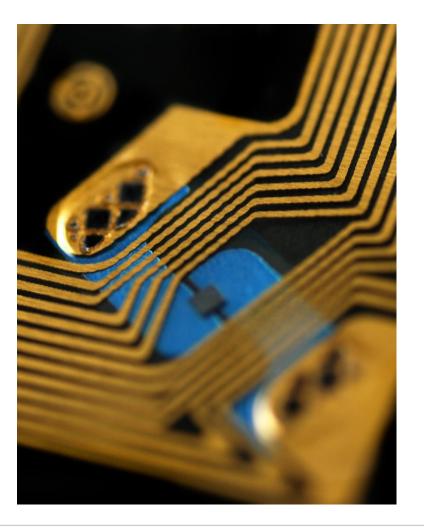
### Awareness

- Integrated into HACCP
- Inter relationship of HACCP, TACCP and VACCP
- Horizontal and vertical hazards
- Horizon scanning
- Communication and collaboration across supply chain
- Safety vs price vs quality vs delivery issues



## New technologies

- New packaging
- Nano coatings
- RFID
- TTI
- Block chain
- Internet of Things



# Any change can introduce risk

Be sensitive to any changes – risk assess





## Conclusions



Supply chains are complex

# Each additional stage increases risk

### How Leatherhead can help

### **Global Regulatory Services**

Expertise in food safety regulation in UK, EU and Rest of World

- Up to date
- Will remain conversant with all changes as the come online
- 100+ countries and 20+ languages covered
- Can help you with small local checks and as you grow internationally

### Food Safety Services

Accredited microbiology and food safety labs and personnel

- Risk assessments on your supply chains and processes
- Challenge testing of products
   and processes

# Thank you

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# **Mike Williams**

## Director STS, part of the ELAS Group



## **Protecting your Supply Chain**



TRAINING . AUDITS . DOCUMENTATION . CONSULTANCY

## Introduction







## **Why Protect The Food Chain?**

- Ensure final consumer safety
- Provide your customers with confidence in the product supplied
- Moral duty
- Maintain your reputation
- Legal requirement







## Challenges



Source: Food Standards Agency





## **Third Party Auditing**



Food Safety System Certification 22000









Safe and Local Supplier Approval

## GLOBALG.A.P.

nsmc



## **Announced or Unannounced?**

- Various schemes have unannounced options
- BRC customers such as ASDA and Co-op require unannounced

Announced	Unannounced
Allows for supplier to pre-prepare	No pre-preparation (except for permitted windows)
Avoids difficulties for auditors on the day of the audit	Creates difficulty of lack of technical expertise on site during the audit
Allows supplier to demonstrate their full knowledge	True reflection of any given day operational standards

• STS audit schemes likely to be fully unannounced by 2020





## **Best Practice**

- Know your suppliers
  - Keep your supplier data up to date
- Set your standards
  - Require suppliers to be 3<sup>rd</sup> party audit certified
  - Develop/obtain specifications for your products
- Visit your suppliers
- Conduct quality checks of products
- Keep records of complaints
  - Log
  - Investigate
- Sampling





## What Not To Do

- Do nothing...
- Rely on reputations
- Just accept 3<sup>rd</sup> party certificates
- Fail to follow up renewal of certification on an annual basis
- Leave others to do all the work for you!





- Interested
- Responsive & sharing
- Certified to 3<sup>rd</sup> party audit standard (preferably unannounced!)
- Hold highest FHRS rating (Wales) & relevant FSA approvals
- React quickly to complaints and assist in their investigations
- Facilitate trace checks and sampling processes
- Open to assisting with NPD





## Questions









ONECPD Salford Professional Development

# **Refreshments and Networking Break**



# **Guy Bush**

Marketing Manager Klipspringer



## and the impact of

PEOPLE

## **DID** Klipspringer

Compliance with confidence

# **OIID** Klipspringer

**Compliance with confidence** 

## what does the **future** of **food safety** look like?

## OI ID Klipspringer

Compliance with confidence

- Increasing number of allergens.
- Value-add production.
- Trend towards artisan products.
- Smaller production runs, but more of.
- Cannot just keep adding colours.
- Technology isn't the answer to everything.

what differentiates between **good** and **great?** 

#### OIIO Klipspringer

# PEOPLE

your team are the key differentiating factor for every facet of success

#### Ollo Klipspringer

so what about the

# PEOPLE

is different?

#### OI O Klipspringer





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# What is CULTURE?

#### **CIID Klipspringer**



# VISION



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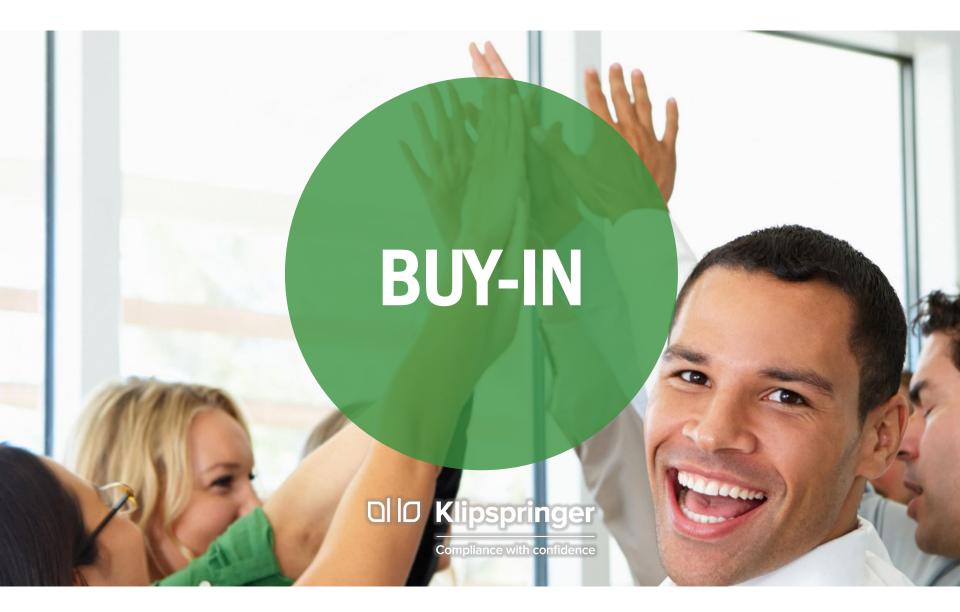
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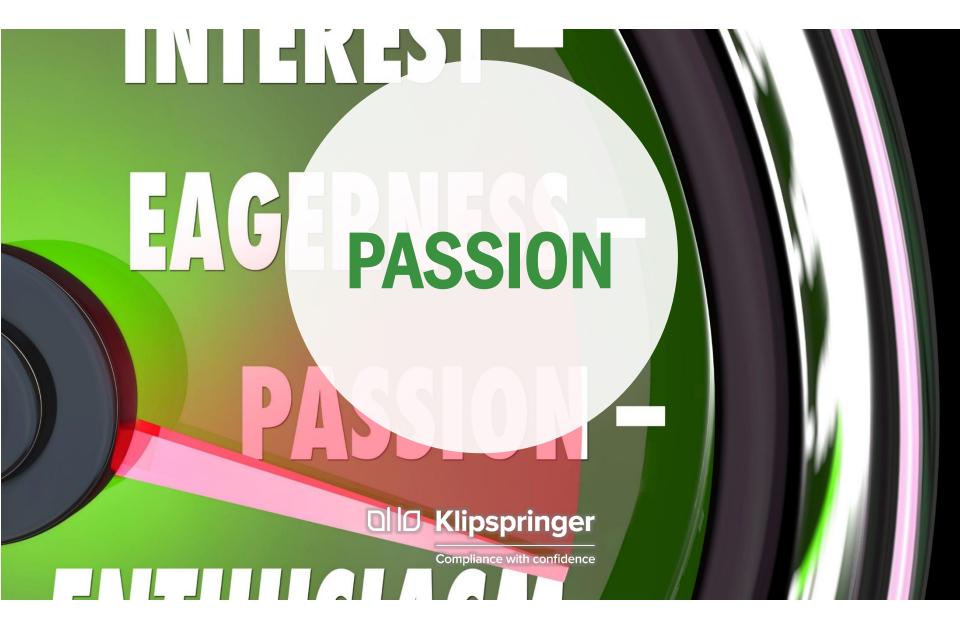
#### DI 10 Klipspringer

# What does CULTURE

achieve?











# EFFICIENCY

## OIID Klipspringer



# **The Greencore Way**

YA



## **The Greencore Way**

greencore

Green Book

# What can you do?

Remember that, people at the core means you, me, everyone in the business!

We are all custodians of our principles. So, what does this mean for you?

- Put people at the core of everything you do
- Be passionate about helping us make great food
  Be truly effective in all our business matters
- Be truly effective in an our business matter
   Practice cost efficiency by delivering real value at all times

Your constant attention to the principles of The Greencore Way will help us deliver our ambition for all stakeholders, as we become the leader in the food industry that we know we can be.

#### The rewards for this are plain:

- A stronger business with more potential to develop and improve skills
- Greater job security with more career opportunities and choice
- Deeper knowledge and connection to what Greencore is about
- More pride in what we have achieved and in how we contribute to all our stakeholders
- A more fulfilling and enjoyable place to work

#### The Greencore Way describes both *who* we are and *how* we will succeed

Coc

It is a simple model that brings together all the key elements of what we are about at Greencore. It is based on four core principles that are all central to how we deliver our vision. The most important principle is **people at the core**.

Our principles then naturally link to our key stakeholders.



It will take time to embed, but if we are successful in living The Greencore Way, the benefits should be significant individually, for businesses, functions and teams and for the Group as a whole.

It will be relevant in both the 'bad times' and the 'good times'.

OIID Klipspringer

Compliance with confidence

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# **CULTURE** can be the **DIFFERENCE**

#### OID Klipspringer

## **OIID Klipspringer**

Compliance with confidence

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#### **DID** Klipspringer



# Please make your way to the seminar room:

# Seminar A – room AH012 (main plenary) Seminar B – room AH010



# Simon Wood

# Product Manager Autoscribe Informatics



## Food Safety through Environmental Monitoring to meet FSA and modern xGMP standards

Simon Wood PhD Product Manager, Autoscribe Informatics May 2017

The Future of Food Safety Conference

Food Quality Issues are Everywhere

- Hummus crisis? What hummus crisis?
- By Cherry Wilson & Habiba Khanom BBC News 26 April 2017
- Sainsbury's and Marks & Spencer were forced to withdraw their hummus following complaints their ranges did not taste as they normally should.
- Sainsbury's said it had taken a number of lines off the shelves because of a "production issue" and were investigating.



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#### FSA Food Alerts 2017

- When its got here it's too late
  - Bleikers Smokehouse Ltd recalls Coldwater Prawns and Tiger Prawns because the products are labelled with incorrect use by dates 21 April 2017
  - Morrisons recalls Trimmed Beans because the product may contain small pieces of metal 20 April 2017
  - Marks and Spencer recalls Chicken and Vegetable Soup following possible chemical contamination 24 March 2017
  - Cleone Foods recalls patties because of incorrect labelling 24 March 2017
  - Douglas Willis recalls various meat products as they may contain small pieces of hard plastic (Wales only) 22 March 2017
  - Quorn Foods Ltd is recalling Quorn Meat Free Mince because the product may contain small pieces of metal 2 March 2017
  - Lotus Bakeries UK Ltd recalls Lotus Biscoff Crunchy Biscuit Spread because the product may contain small pieces of metal 2 March 2017
  - Pets at Home recalls four dry cat food products due to low levels of thiamine 27 February 2017
  - Morrisons recalls Peppered Beef Slices because of the presence of Listeria 18 February 2017
  - Sainsbury's recalls stir fry products due to possible presence of salmonella 9 February 2017
  - Great Northern Sandwich Co recalls six chicken products because of possible contamination 7 February 2017
  - Co-op recalls its Hollow Milk Chocolate Bunny because of possible product tampering 31 January 2017
  - Waitrose recalls Hearty Minestrone Soup because the product may contain blue plastic pieces 25 January 2017
  - Clayton Park recalls Twin Packed Cream Cakes due to incorrect date marking 20 January 2017
  - Thorntons recalls Hollow Milk Chocolate Jolly Santa 19 January 2017
  - Consumers warned about frozen meat and fish products supplied by MDA Products Ltd\* (updated Jan 20) January 2017





#### Food Safety is a Political Issue

- Foreign Secretary Boris Johnson quipped that a post-Brexit free trade deal with the US might 'liberate the haggis' which currently can't be exported there
- The problem is you can't just stick it in a container and send it over there



### Changing Landscape of Food Safety

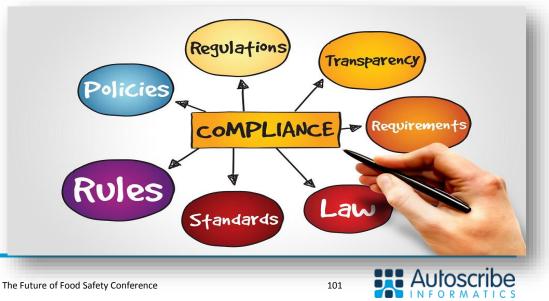
- FDA's Foreign Supplier Verification Program (FSVP)
- FDA's Voluntary Qualified Importer Program (VQIP)
  - May require facility certification based on regulatory audits, corrective action planning and review of safety records
- FDA changing approach to control of Pathogens in Ready to Eat Foods
  - More willing to take regulatory action
  - Companies need to implement preventative measures





### Changing Landscape of Food Safety

- FSA Regulating our Future Proposals
  - Assurance achieved through evidence of compliance with standards
    - Opportunity to use business's own data
  - Maintained provided information received is continually satisfactory
  - Potential for 3<sup>rd</sup> parties to provide accredited assurance
  - Sanctions to tackle non compliance



### Data and Information - Supporting Food Safety

- Data and Data Management key in ensuring compliance, reducing risk and maintaining profitability
- Information Management must be a key management focus



#### Data and Information – Supporting Food Safety

#### **Business Driver**

• Shift in focus from screening to prevention and evidence of compliance

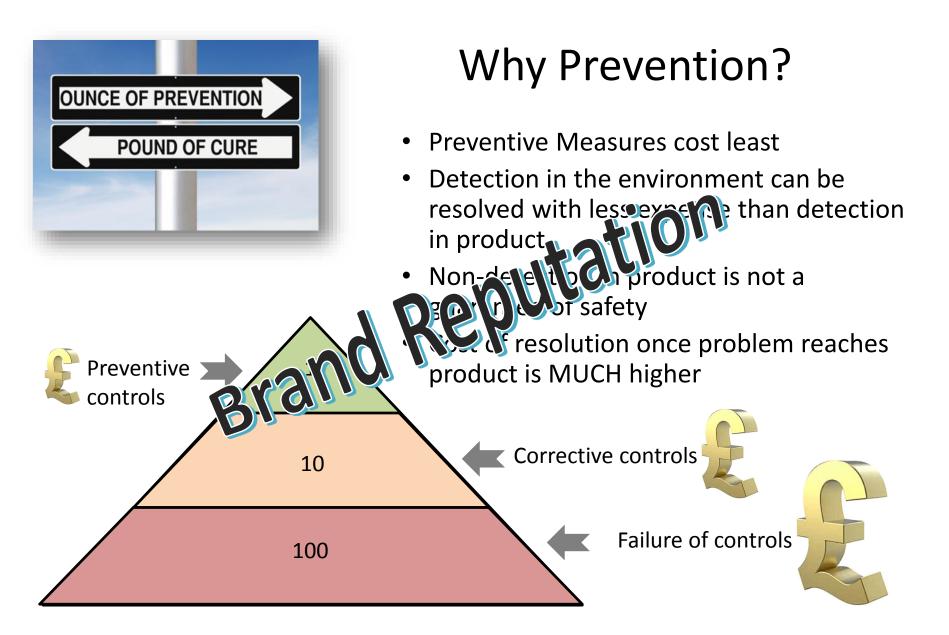
• Increased legal actions against those who fail to demonstrate effective preventative measures

• Complexity, extent and cost of recall process

#### **Data Support**

- Monitor adherence to preventative action program
- Manage data created and identify trends
- Drive decision making process
- Ensure adherence to Quality Standards
- Manage data required to demonstrate compliance
- Deliver data in the correct format
- Ensure validity or security of data
- Use data generated to prevent release of product to market
- Batch and Lot management data provides traceability of ingredients and distribution







#### What If These Had Been Prevented?

- Humbugs contaminated with Arsenic, 1858 Bradford •
- Fake oil, 1981 Spain ۲
- Austrian Wine adulterated with Ethylene Glycol, 1985 Austria
- Eggs and Salmonella, 1988 UK
- **BSE, 1990s UK** ۲
- Beef flavoured fries, 2001 Global ۲
- •
- Peanut products and salmonella, 2008 US Sudan 1 in various food products affecting 300 suppliers, 2005 UK ۲
- Horsemeat scandal, 2013 UK ullet



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#### **Environmental Monitoring Supported Prevention**

- The definition of sampling and testing regimes to monitor and prevent possible contamination of food products during the production process
  - Applicable to Transportation and Storage of food products as well
  - Requires the definition of the Sampling Points, Sampling Frequency and specific Action and Alert limits
  - Linked to HACCP
  - Similar requirements exist in Pharmaceutical and Medical Device manufacturing and Healthcare

**Proactive Environmental Monitoring regimes avoid costly line stops, illnesses, and deaths...** 



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#### Defining an Environmental Monitoring Program

- What sites and sampling points are being sampled?
- How often is each sampling point being sampled?
- Which test(s) are to be performed?
- How frequently should the tests be performed?
- What are the Alert and Action limits for the Sample point and Test combination?
- What happens when an Alert or Action limit is exceeded?
- Who can manage the program and what happens when it changes?
- What qualifications are needed for staff involved in the program and how is this managed?





### Managing Environmental Monitoring data

- How is the information for individual sampling points recorded and managed
- How is the data and information from across the entire process integrated?
- Is there clustering of problems points and can trends be identified?
- How are Corrective Actions associated with findings?
- How is relevant information exported or presented to relevant authorities
- How can potential fraud be prevented i.e. falsification of results



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### Using LIMS to manage your EM program

- Laboratory
- Information
- Management
- System



Laboratory information management systems

- Commonly used in manufacturing and other industries to manage laboratory generated data
- Often used for QA/QC purposes but also in many other applications including Shelf Life studies and Environmental Monitoring



### Using LIMS to Define an EM Program

Laboratory information management systems

Matrix

GEMINI LIMS

### **Defining an EM Program**

- What sites or sampling points are being sampled?
- How often is each being sampled?
- Which test(s) are to be performed?
- What are the Alert and Action limits for the Sample point and Test combination?
- What happens when an Alert or Action limit is exceeded?
- Who can manage the program and what happens when it changes?
- What qualifications are needed for staff involved in the program and how is this managed?

### Defining an EM Program in Matrix Gemini LIMS

- Sampling points mapped to picture or schematic of the facility
- Define sampling frequency for each sample Point for automatic sampling
- Tests defined and managed in the system
- Specific limits set for test and sampling point combination, and checked when results entered
- Real time notification when limits are exceeded
- Set up defined by Users and system can be further configured to meet specific needs
- Access to specific function and options can be controlled and Certifications and Competencies can be managed



### LIMS and Managing EM data

**GEMINI LIMS** Laboratory information

Matrix

management systems

### **Managing EM Program Data**

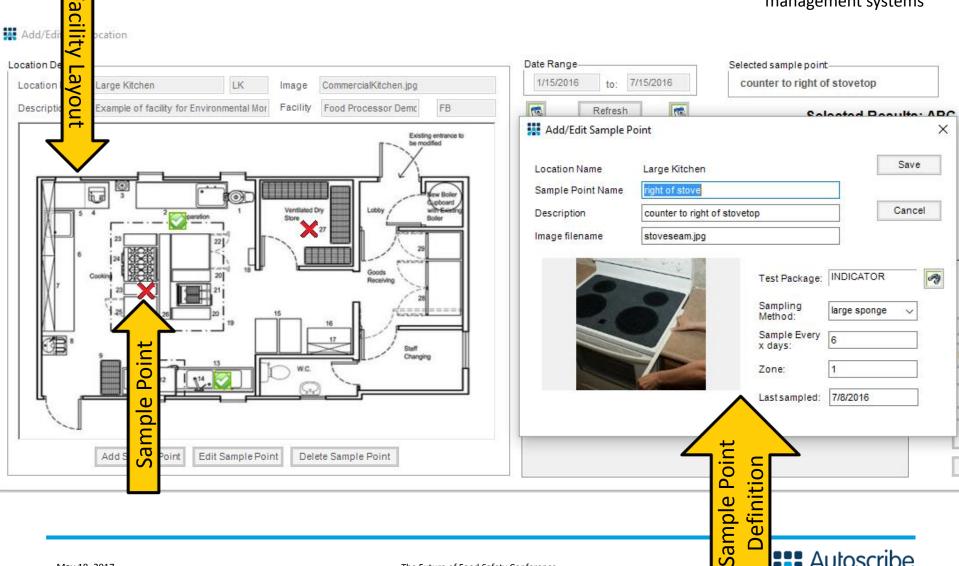
### Managing EM Program Data in Matrix **Gemini LIMS**





### **Documenting Sampling Sites**

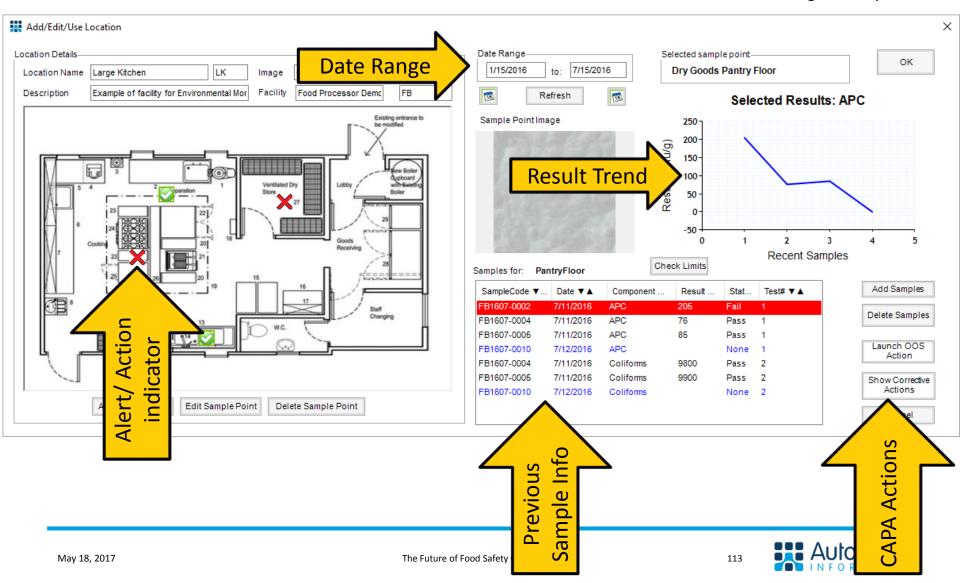
Laboratory information management systems





## **Status Monitoring**

Laboratory information management systems



### It's Information Management Not Just Lab Management

- We don't have a laboratory why would we need a LIMS?
  - All analytical work is outsourced
- You still need to manage the analytical data from your contract lab or labs
  - How do you integrate information from different sources?
  - How do you add the value to it?
  - How do you make it work for you?
- LIMS helps manage that data and information and reduce risk in your organization

You don't need a laboratory to benefit from a LIMS



### Matrix LIMS – An Complete Solution

- LIMS provides an integrated solution for food safety and QA/QC programs
- Provides support for Good Manufacturing Practice (GMP) principles
  - Helps ensure quality of manufactured product



### LIMS and 10 Key GMP Principles

### **GMP Key Principle**

- Defined operating procedures and work instructions to establish controlled and consistent performance
- Adherence to written procedures and instructions
- Prompt and accurate documentation of work for compliance and traceability
- Prove that the systems do what they should through validation
- Properly defined and designed system and equipment

### Matrix LIMS Support for Key Principle

- SOPs maintained within the integrated document management system and available within the LIMS
- SOPs available within the LIMS. Visual workflows guide users; access rights and competency tracking control who can do what
- Actions performed associated with who and when (Electronic Signatures). Changes recorded in Audit Trail. Results captured automatically from instruments and instrument ID recorded. Record of media and reagents used.
- LIMS provides data and information to support validation activities

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• Environmental Monitoring and mapping of facilities provides objective evidence



### LIMS and 10 Key GMP Principles

#### **GMP Key Principle**

• Properly maintain facility and equipment

- Define, develop and prove job competency
- Protect products form contamination
- Build quality into products

• Perform regular audits to ensure compliance

### Matrix LIMS Support for Key Principle

- Equipment and Instrument Maintenance and Calibration schedules supported. Instruments can be made unavailable if out of maintenance or calibration
- Competency and training records maintained in LIMS
- Support required QA/QC testing regimes as well as EM
- LIMS supports QA/QC processes. Test raw materials and finished products against Master Record specifications. Release mechanism and record for Batches and Lots. Full traceability of actions supported
- LIMS Data supports audit process (internal and external



### Can You Risk Not Having This?

- Intuitive framework to define and manage an EM program
- Simple collection and aggregation of data for analysis, trend analysis and compliance purposes
- Support for, and evidence of adherence to, Quality procedures and GMP principles
- Assurance of the quality and safety of your products
- Protection of your reputation, profitability and the health of the public

# Autoscribe

Visit our website: <u>www.AutoscribeInformatics.com</u> Listen to our webinar: <u>https://attendee.gotowebinar.com/recording/22222</u> <u>4863526437633</u>





ONECPD Salford Professional Development

# Lunch, Networking and Exhibition



## **David Clarke**

## Chief Executive **Red Tractor Assurance**



## Third Party schemes in the UK supply chain

May 2017



## **Third Party Schemes**

- Third party schemes in general
- Red Tractor scheme in particular
- Food safety in primary production
- Co-regulation
  - private and public sectors working in co-operation



## **UK Food Industry Standards**



Reputation management driving high standards for >60 years

- M&S 1950s
  - First food retailer to focus on own label
  - First retailer to put their own reputation on the line
- Growth in retailer branding + 'Due Diligence' defence 1990
  - + Food Scares of 1990s
    - = greater pressure for supply chain management



# No matter who causes the problem the consumer brand gets the blame



Run for Your Lives Lads!!!

25.50

IVECO

Rang

Fussy pictors.

Careful packers

Helpful drivers.

Service Services

-040

and the second

# HailOnline

EXCLUSIVE: Shocking footage on Morrison's farm reveals pigs crammed into tiny cages





## **Due diligence & reputation management**

- Plan A do it yourself
  - Second party standards and inspections
  - Conflicting / inconsistent standards
  - Massive duplication of inspection effort
  - Inefficient; Hugely costly
- Plan B
  - Third party schemes
  - Co-operation on pre-competitive issues
  - Efficient
  - Effective?



## Pennington Inquiry Cardiff, 14 May 2008

Fatal E.coli outbreak – school meals in South Wales

.. the major supermarkets and food manufacturers do not rely on regulatory inspectors to ensure the safety of food being purchased. There is apparently in place a third party auditing system organised by the British Retail Consortium. These audits and inspections seem to be much more stringent ..

.. the families believe that their children should not have to eat meat which is less safe than that which they could have purchased in Tescos.



## Third party schemes in the UK

Assurance of agricultural inputs Feed / organic fertilisers





### Farming

**Red Tractor scheme** 

Safe food / animal health and welfare / environmental protection / traceable

British

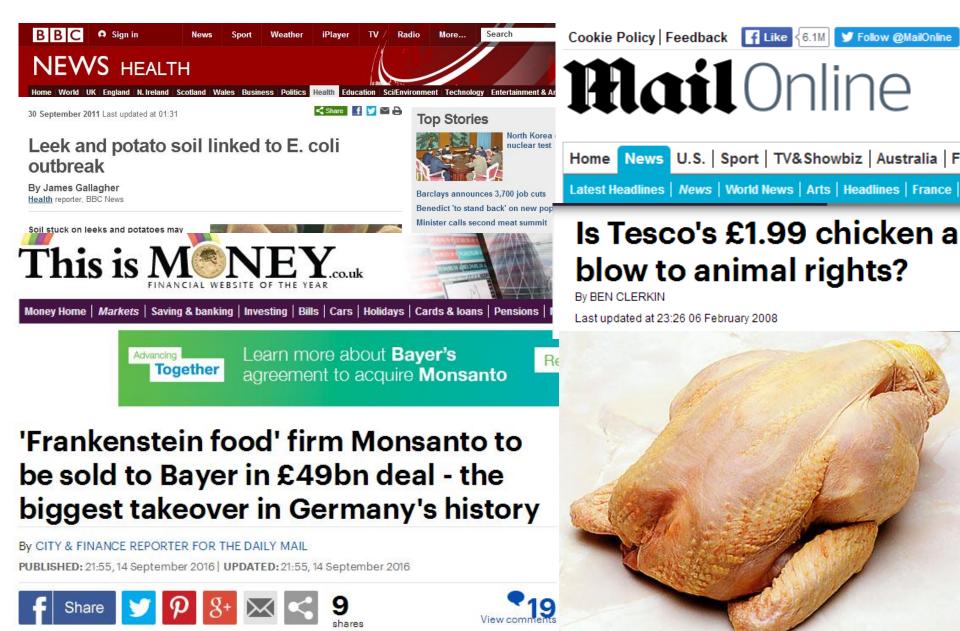
Processing BRC Global standard Safety / Integrity







## Primary sector - what can possibly go wrong?



## Hazards from the primary sector

- BSE
- FMD
- Campylobacter
- Pathogens in salads and beansprouts
- Pesticide residues
- Anti-microbial resistance
- Animal Health and Welfare
- Environmental pollution
- Traceability
- Etc etc etc .....



The certification scheme for the UK primary sector

- Owned and established by the UK food chain
  - Retailer / processor / farmer trade bodies
  - Operating independently
- Operates on a not for profit basis
  - Modest charges to cover costs
- About 80% of UK agricultural output from Red Tractor farms
  - >90% for some commodities dairy, poultry
  - 80,000 farms across the UK



## **Standards**

- Developed by panels of experts from all sections of the industry
- Based on legal requirements
  - + additional criteria where necessary
- Comprehensive book of farm standards for every (6) commodity sector
- Focussed scope safety, animal health & welfare, pollution, traceability
- Updated at least every 3 years



## Robust



Standards are worthless without conformity

- Operated as a formal Certification Scheme
  - .. by commercial Certification Bodies
  - .. accredited to ISO 17065 by UKAS
  - + strong oversight by the scheme owner
- Frequent and thorough inspections
  - Every farm, every requirement, every 12-18 months
  - (typical regulatory inspections 2% per annum)
- Serious sanctions
  - Exclusion from the scheme has serious consequences



## Gone full Circle

Schemes created to address regulatory failure now used by regulators

UK Industry schemes ~90,000 members/100,000 inspections per year

Scheme inspections much more frequent than regulators

Avoiding duplication

Sharing of intelligence



## **Working with Government since 2006**

- Proper validation
  - E.g. University Warwick study 2015\*
  - Benchmarked against 40,000 animal health inspections
  - Certified farms significantly higher levels of compliance
- Formal agreements
  - 18 page MoU with FSA
  - Quarterly liaison and accountability
- Passed FVO scrutiny
- High level recognition
  - Cabinet Office January 2017
  - Commends industry "Regulated Self Assurance"
  - Cites Red Tractor as a prime exemplar

Regulatory Futures Review	
January 2017	



\*Animal Welfare 2016, 25, 461-469

## **Working with Government since 2006**

- Real efficiencies benefits both for producers and the public purse
  - E.g. Frequency of regulatory inspections
    - Most farms 25% per year
    - RTA farms 2% per year
  - Dairy hygiene
    - Default every 2 years
    - Red Tractor farms every 10 years
  - Environment Agency pollution control regs
    - Default 3 inspections per year
    - Red Tractor farms 1 inspection per year



## **B2C – Red Tractor logo**

Appears on £13 billion worth of product every year

### A vehicle for promotion

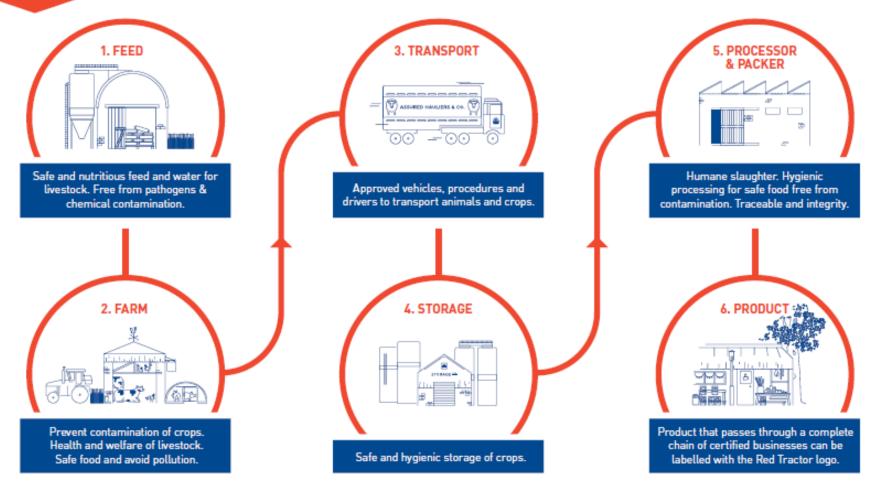






### **CERTIFICATION AT EVERY LINK IN THE SUPPLY CHAIN**

Delivering buyer protection, legal compliance and more throughout the supply chain.



### Using the power of the Red Tractor logo to ensure integrity and traceabiliity throughout the supply chain



- Industry standards
  - Important drivers of best practice and legal compliance
- 3<sup>rd</sup> party schemes an efficient approach to pre-competitive topics
  - But 3<sup>rd</sup> Party must be as reliable as 2<sup>nd</sup> Party
- Hazards from primary production are best controlled at source
  - Red Tractor is the leading assurance scheme in UK farming
- Originally designed to provide efficiencies within the industry.
  - Now avoiding duplication & achieving efficiencies with regulators





# Will Anderson

# Business Manager BST Detectable Products

# Who Are We?

### Joe Armstrong-Gore Will Anderson

We work for BST Detectable Products. A market leading manufacturer and supplier of food safe detectable products. BST developed the world's first detectable products over 30 years ago, and are known for our high quality products and service.





Joe Armstrong-Gore



Will Anderson





## Understanding Food Safe Detectable Materials & Applying Best Practice

A basic overview of food safe detectable materials intended for use with existing inspection systems in food & beverage production environments.



# What Are We Talking About?

- Foreign body contamination
- The use of inspection systems
- The use of detectable materials
- The performance of detectable materials
- Examples of real life applications
- Mistakes, Assumptions & Best Practice
- Q&A + our new white paper



### Foreign Body Contamination

The term foreign body refers to any extraneous material that finds its way into food or drink.



# The Cost of a Recall

- A common estimate is that the direct costs of a food recall to a manufacturer is around \$10 Million / £7.7 Million. (2015 Estimate)
- According to the FSA 2015 annual report of incidents, foreign bodies still account for 5% of all incidents. (76 / 1514)



### 2017 so far . . . .

- Six major recalls caused specifically by plastic & rubber contamination from January – April 2017. Details in our whitepaper
- We're here to discuss materials available that reduce the risk of this happening in your company as far as possible.



# The Rise of Detectable Products

• 1980's (Iron filings)

Crumpet Rings / Seals

- 1990's (Basic detectable materials) Basic metal detectable pens
- 2000's (Diversification)

Retractable Pens, Scrapers, Marker Pens, Hand Tools, Sheet Materials

• 2010's (Dual Detectability)

Colour Co-Ordination / Food Contact Compliance / Impact Resistance Testing / Documentation / Research



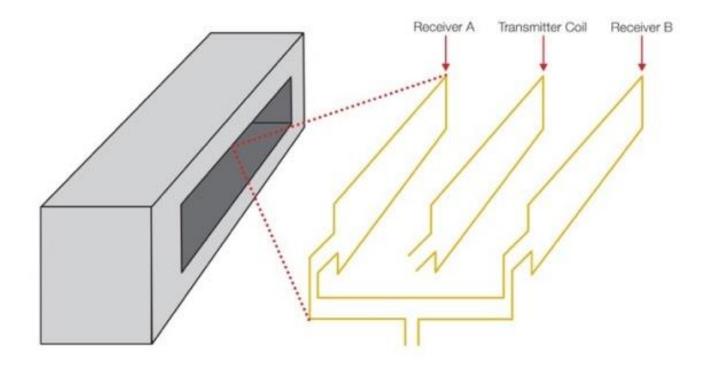
#### Product Inspection & Detectable Products

- Detectable plastics and rubbers are detected and rejected in the same way as other contaminants.
- Ferromagnetic additive is used for metal detectability
- High density additives are used for x-ray visibility
- Silver-ion additives are used for antibacterial protection
- Lets introduce the inspection systems to help understand the importance of this



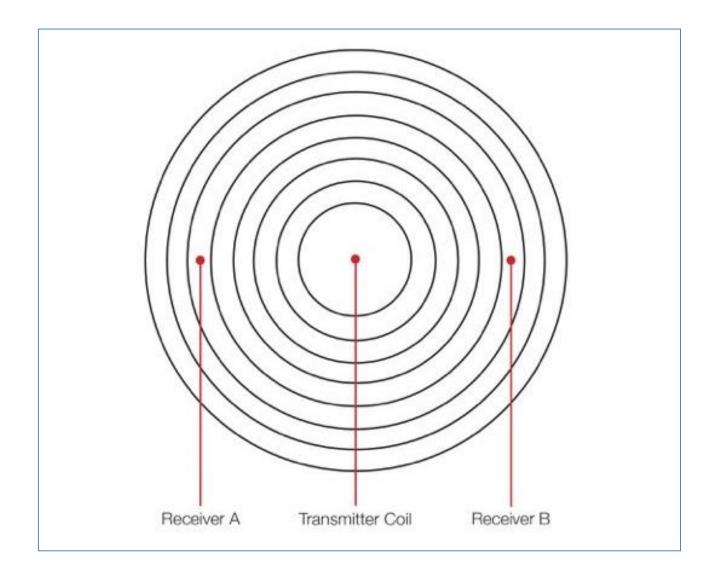
### Metal Detection

• Most industrial metal detectors used in food production are based on a balanced coil system.





#### **Metal Detection**

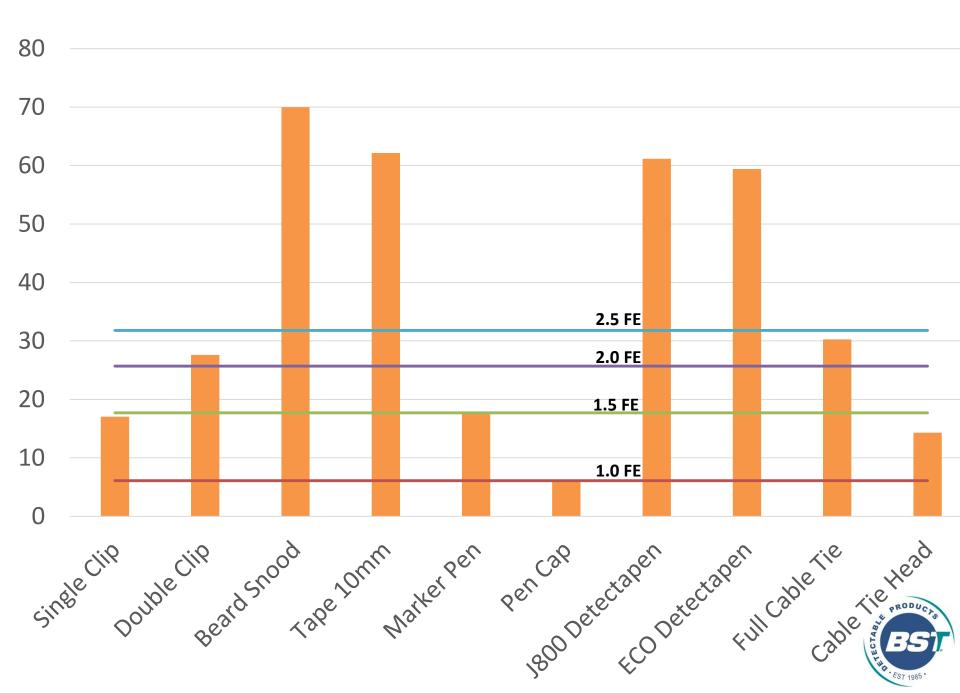




# Product Effect

- The food passing through the metal detector also disturbs the magnetic field (product effect).
- The product signal has to be learnt and compensated for (calibration)
- The stronger the product effect the lower the sensitivity achievable.

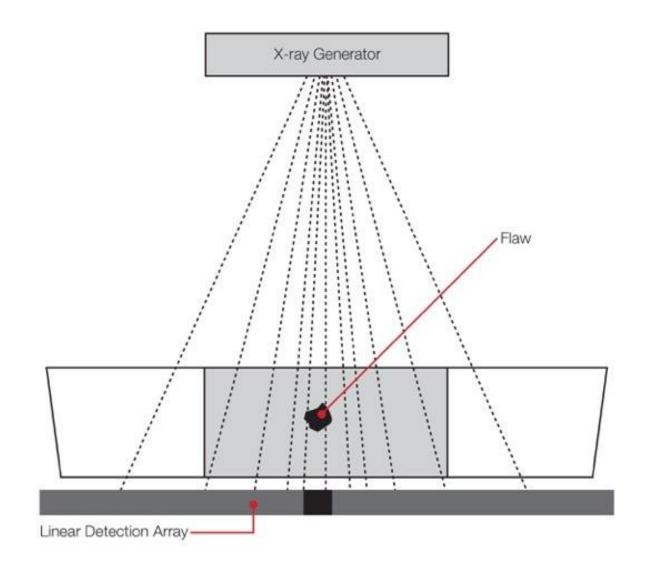




# X-ray Inspection

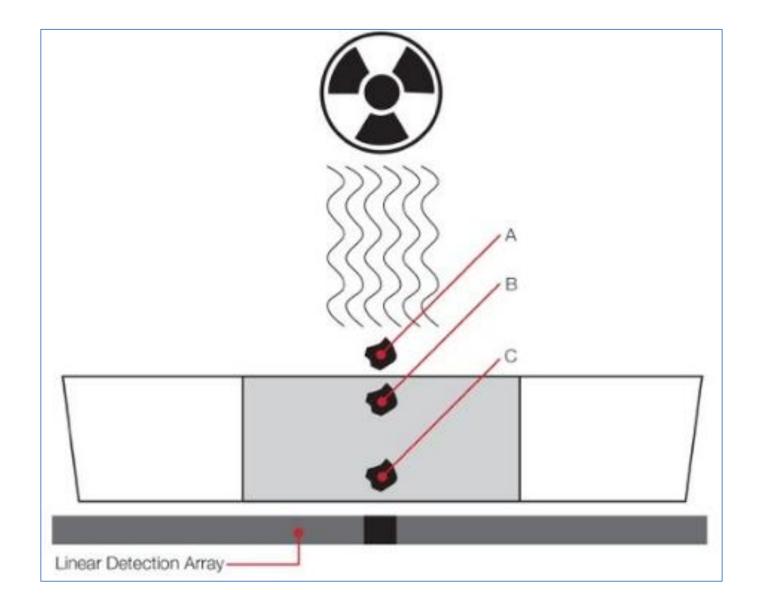
- Passes low energy x-rays (gamma radiation) through the product to generate a radiograph.
- The denser materials absorb more x-rays and show as a darker area.
- Capable of detecting a wider range of contaminants subject to their size & density





### Simple X-ray System





# **Vertical Contaminant Position**





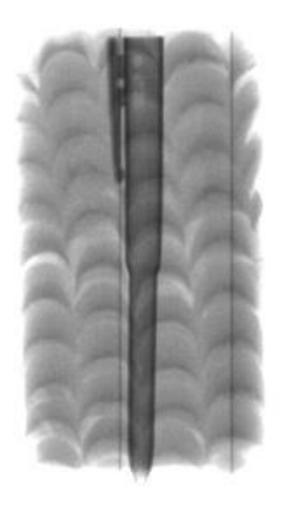
### Testing Session (Jan 17)

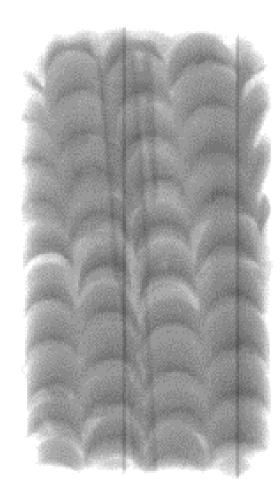


With great thanks to Peter Walker at Minebea Intec UK



#### Detectable vs Non Detectable







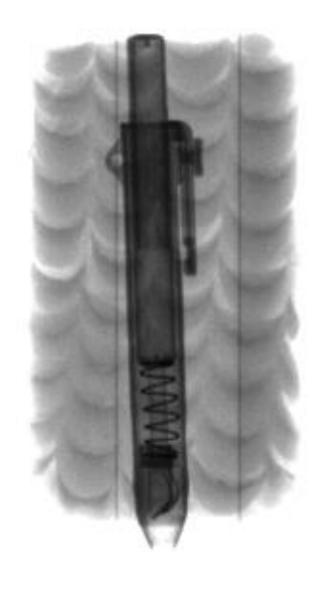
# **Dual Detectability**

- Not all materials are optimised for x-ray
- Detectable materials are not born equal
- Be wary of the word 'detectable'
- Metal Detectable / Part Detectable / X-Ray Visible / Dual Detectable



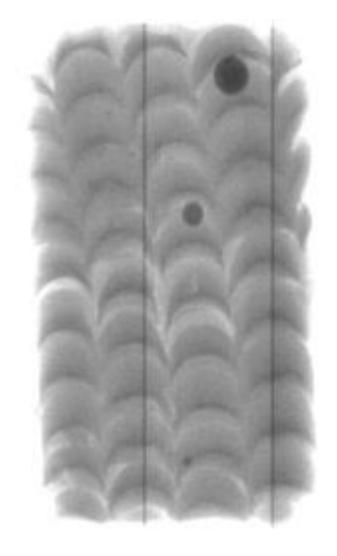
### Metal Detectable v X-Ray Visible

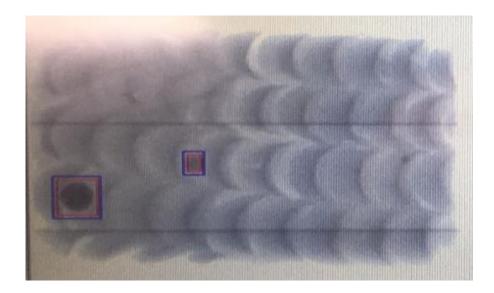






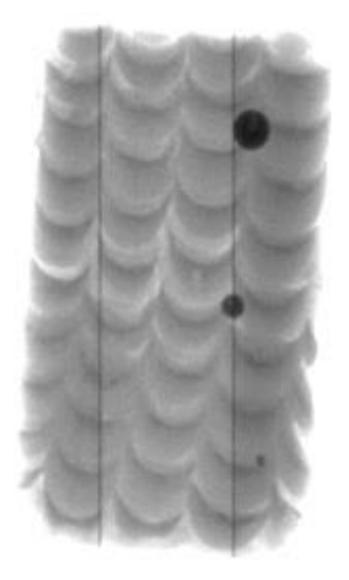
#### Non X-ray Optimised Polymer

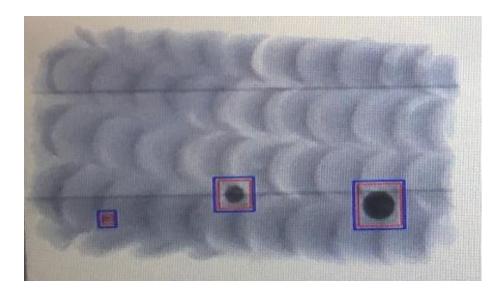






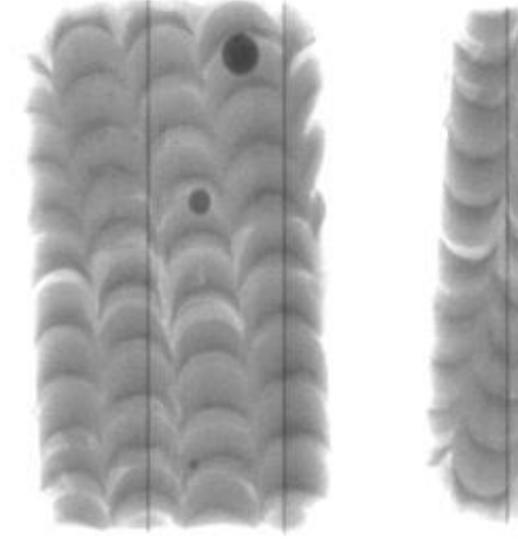
### X-Ray Optimised Polymer

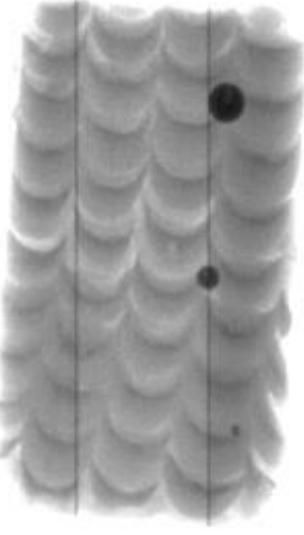






### **Direct Comparison**







# **Additional Performance Factors**

Detectability is of course a critical performance consideration but don't forget to consider:

- Colour Brightness
- Food Contact Compliance
- Shatter Resistance
- Antibacterial Protection



### **Bad Detectable Products**

- Shatter easy
- Dull colours
- No food approval
- Not x-ray optimised





# **Good Detectable Products**

- Shatter & impact resistant
- Bold & bright colours
- Extensive food contact approval
- X-Ray optimised
- Additional benefits such as antibacterial protection







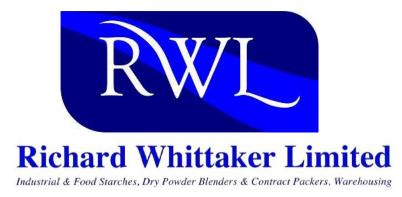




### Case Studies on Bespoke Items

 The following are examples of BST customers operating in different environments using a variety of bespoke detectable products & materials developed specifically for their applications.





- Richard Whittaker LTD blend and package a huge range of dry starches such as potato, maize (cornflower), rice, tapioca, wheat etc
- As a BRC standard accredited site, which aims to continually improve standards; RWL turned to BST for a bespoke modification to their blending line setup.
- The previous discharge sock was becoming problematic and change was required.



# The Problem

- The flexible discharge sock where blended product falls from the grid magnet was becoming frayed and cracked.
- This was identified as a potential foreign body risk and an alternative was to be sought.
- A more durable, detectable material was needed



# The Solution



 A woven fabric mesh sprayed with a blue neoprene rubber containing ferromagnetic additive.



# **Ready Meal Producer**

- Manufacturer of supermarket own brand frozen ready meals which include Traditional, Chinese, Indian, Italian and Dessert products.
- Operate five colour co-ordinated production lines with a sixth colour to identify multiple area items.
- Use tie ID tags to colour mark assets designated for use in specific production lines.



### The Problem





# The Solution

- New injection moulding tool, impact modified material.
- Supplied six colours of tags over 18 months ago. We never heard from them again . . .







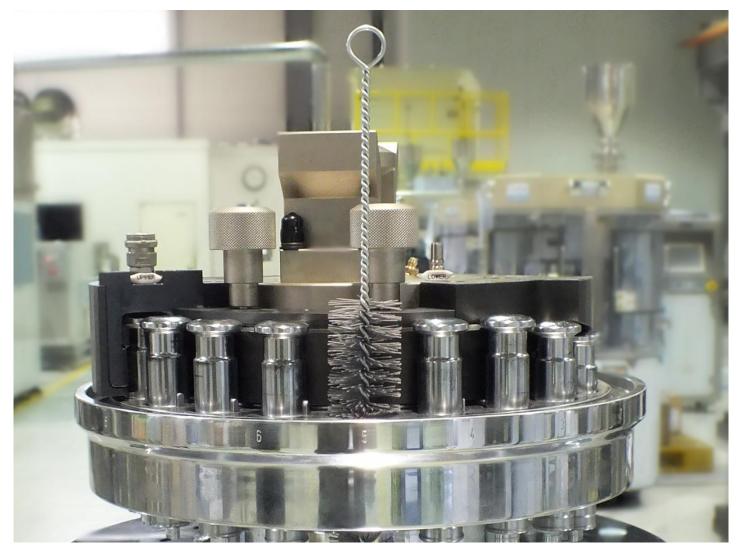


### Nutraceutical Environments

- A leading tablet press manufacturer approached BST, looking for ways to improve the safety of their machinery.
- Used BST's detectable plastic rod to machine driving rods.
- Used bespoke BST tube brushes for tablet press cleaning kits



### Small Aperture = High Sensitivity





## Mistakes & Assumptions

- Don't assume all materials are x-ray visible
- Test all products and fragments on your system
- Don't assume food contact approval, check with your manufacturer
- Make sure your inspection system is correctly and routinely calibrated
- For a detailed best practice guide, request a copy of our new whitepaper





- "A white paper explaining the safe & successful use of detectable products and materials in food production environments"
- Written by Joe & Will



# Any Questions? Read Our Paper

- We hope that we have provided a good overview of detectable products and materials.
- We hope that it will help you consider the important factors when selecting materials and articles for your factory.
- See us on the stand or read our paper





## **Greg Jones**

#### Senior Microbiologist Campden BRI



# Developments and Practices to extend shelf life

Dr. Greg Jones

# Topics

• The 10 Day Rule

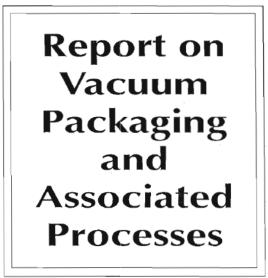
Shelf life extension

Pressures and solutions



# The '10 Day Rule'

Advisory Committee on the Microbiological Safety of Food



Advises the Government on the Microbiological Safety of Food

- Produced in 1992
- Set down a set of 'controlling factors' for chilled VP/MAP food.
- Intention to reduce risk from non-proteolytic *Clostridium botulinum*



# Controlling Factors for *C. botulinum* in chilled VP/MAP products

- A chilled shelf life of 10 days or more is permitted if one or more of the following are met:
  - pH of 5 or less throughout the product
  - Aw of 0.97 or less throughout the product
  - Heat treatment of 90°C for 10 minutes or equivalent throughout the product.
  - Salt of 3.5% (aq) or greater throughout the product.
  - Any combination of factors **proven** to inhibit growth or toxin production by *C. botulinum*.



# Updates to original document:

- 1996: Campden Guideline 11 published.
- 2008: FSA document published.
- 2009: Campden document updated.
- 2017: FSA document updated.

• Controlling factors do not change in any of these documents.



# Issues surrounding the 10 day rule:

- Many products considered to be 'safe' by industry do not meet controlling factors.
  - Vacuum packed fresh meat
  - Bacon
  - Ham



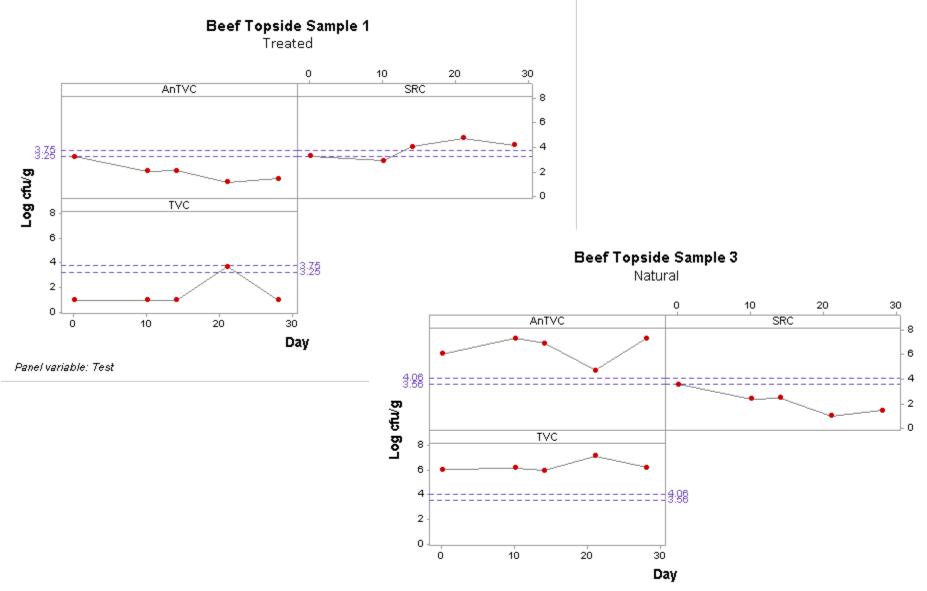
# Example of Industry response

- BMPA (British Meat Processors Association)
  - Commissioned large scale series of challenge tests

 Investigation into identifying the controlling factor(s) which has prevented *C. botulinum* poisoning in vacuum packed meat.



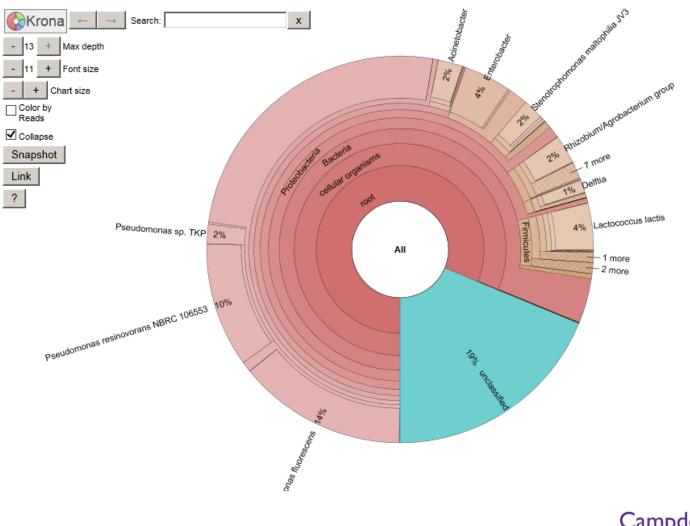
## **Example of outputs**



Panel variable: Test

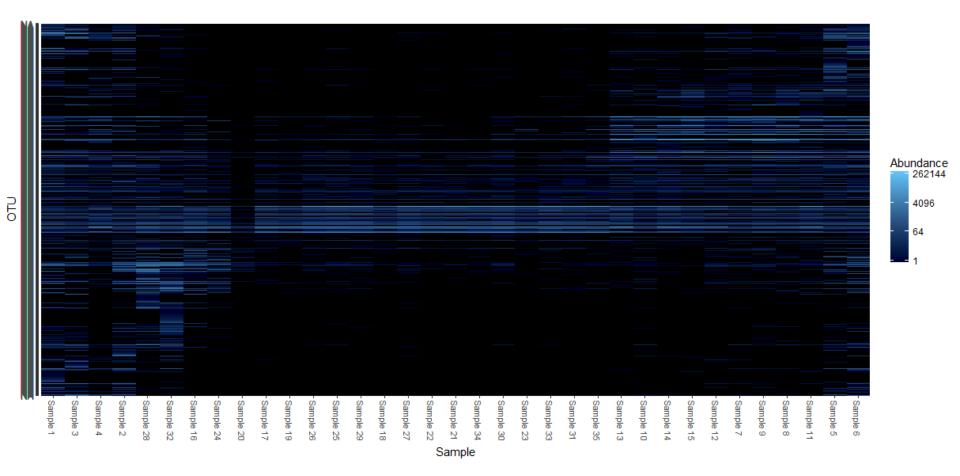
# **Outputs continued**

#### KRONA CLASSIFICATION CHART





# **Outputs continued**





# A victim of its own success?

 The food industry has been very good at presenting food as 'fresh' and 'natural' whilst extending shelf life through use of artificial aids.

• Those aids are being challenged, whilst at the same time shelf life is required to be the same or greater than before.



#### **History of Chemical Food** Preservation Modern **Enthusiastic Early Age** Age Industrial Age Increased use of benzoic acid salts. •1755 - Borax Salting Sorbic acid •1833 - Creosote (!) discovered and •Smoking produced industrially •1858 - Boric Acid Pickling Revision of •1859 to 1875 - formic, legislation in light of salicylic and benzoic •Vinegar toxicological data. acids •Oil Increased use of •1907 - Formaldehyde protective gasses. and Hydrogen peroxide •Honey used in milk



## Pressures to reduce....



- Salt
- Sugar
- Weak acid preservatives
- Antioxidants
- ....anything that sounds
   "Chemical-ish"

CLEAN LABEL



# Example of hysteria:

# **ANTIOXIDANTS CAN KILL**





# What does that leave us with?

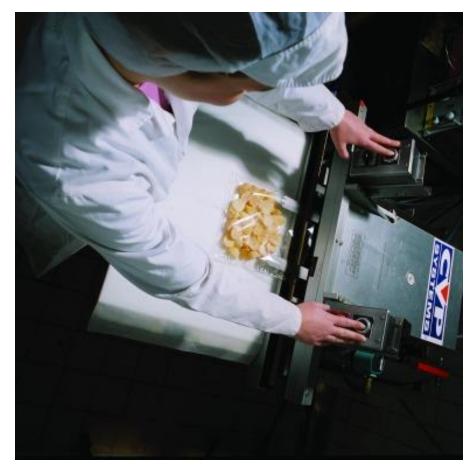
- Packaging
- Formulation
- Storage Temperature
- Processing
- "Natural" antimicrobials
- Quality of ingredients
- Hygiene of factories





# Packaging

- Vacuum / Modified Atmosphere
- Active Packaging
- Better barriers to gasses
- No "Big Thing" in the last decade





# **Storage Temperature**

- Superchilling
  - Offers a partial solution
- Attitude shift in favour of frozen?
- Better temperature control in retail and domestic chillers?



# Processing

- High Pressure Processing
  - Cold Pressed Juices
  - Meats
- Novel technologies
  - Cold Plasma
  - Pulsed Electric Fields
  - Brief Cryogenic treatments





# **Steps forward**

• Evidence-based revision of guidance can remove unnecessary restrictions.

• "Marginal Gains" can lead to extended shelf life.

• Don't expect a magic bullet!



#### Thank You.





ONECPD Salford Professional Development

# **Refreshments and Networking Break**



## **Dr Louise Manning**

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# Risk perception in the food supply chain

Dr Louise Manning Senior Lecturer in Food Policy and Management



#### Risk

Technical tools determine risk using rational criteria and analysis....

General public perceive "risk as a feeling" ...

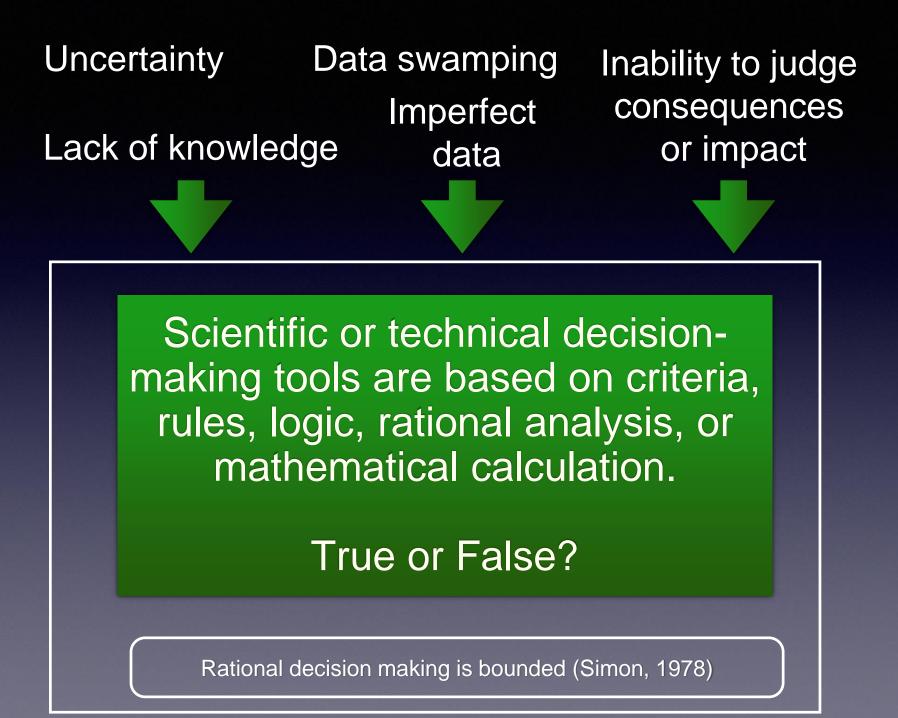
Supply chain stakeholders .. how do they perceive risk?

# **Discussion** points

- The way food suppliers/manufacturers and consumers make decisions
- Perception of safety, hazards and risk
- How do decision-making and risk perception affect safety standards in food production?

Scientific or technical decisionmaking tools used in the governance of the food supply chain are based on criteria, rules, logic, rational analysis, or mathematical calculation.

True or False?



# Risk as analysis

Divergence in risk perceptions between experts and general public are due to differences in levels of :

- Rationality.
- Knowledge.
- Education.
- Understanding of what can often be quite complex issues.

# Risk as analysis

So if the general public just had more information, greater knowledge, more education, they could understand things the way we do and then make the same decisions

. . . . . .

# The way food suppliers/manufacturers and consumers make decisions

- Objective or subjective?
- Science sees risk as "real" using analytical and rational criteria.



See work of Slovic (1982) and after

# The way food suppliers/manufacturers and consumers make decisions

- People generally see risk as "perception", subjective, value based, using cues, often based on past experience or observation to make decisions.
- People make the decisions in the food supply chain too.



See work of Slovic (1982) and after

Analytical systems thinking	Experiential systems thinking
Analytical	Holistic
Logical, reason based thinking	Affective - pleasure or pain based thinking
Logical forming of connections	Connections based on association
Behaviour mediated by conscious appraisal	Behaviour mediated by "vibes" from past experience
Encodes reality in words, symbols, numbers	Encodes reality in concrete images, metaphors, narratives
Slower form of processing, justification by logic and evidence	More rapid processing, orientated towards immediate action, validity driven by belief

Adapted from Slovic et al. (2004)

## Perception of safety, hazards and risk – using heuristics

An approach, or technique, that is used by individuals to solve problems, make judgements and form decisions.

A reductionist way of navigating a given set of issues or challenges using factors such as likelihood, probability, frequency.

Hazard Analysis Critical Control Point (HACCP) uses heuristics to determine risk e.g. decision tree questions..

### Is risk ranking subjective?



Severity/Impact: Negligible, Minor, Moderate, Significant, Severe

Likelihood: Very unlikely, likely, possible, likely, very likely

Qualitative Risk Assessment

Semi- Quantitative Risk Assessment Quantitative Risk Assessment So do how do people assess risk and them make decisions?

Regulators, retailers, food suppliers/manufacturers, consumers

How is safety, hazard and risk perceived?

# What kinds of heuristic do we use?

Heuristics range from broad judgmental strategies to narrow ones

### **Examples of heuristics**

- Affect
- Effort
- Availability
- Representativeness
- Control

## Heuristics are the decision rules we use to determine risk

- Affect: Determining the likelihood of an event based on how we "feel" about it e.g. fear, dread, anger
  - Would the fear of an event happening affect our risk decision-making?
  - Would we just use a 'gut feeling" to determine the risk versus the benefit?

## Heuristics are the decision rules we use to determine risk..

- Effort: Determining the quality of something based on the time and effort invested.
  - Is this how we approach decision-making based on vested interest?
  - Might we just make changes around the edges of a food safety management system because of the amount vested in its original creation?

## Heuristics are the decision rules we use to determine risk ...

- Availability: Determining the likelihood of an event because it is easy to recall or imagine i.e. it is known, real, experienced.
  - If the event occurs frequently do we become immune to it as an issue
  - If the event occurs frequently do we believe it is more risky than an event we don't know about?

### Heuristics are the decision rules we use to determine risk ...

- Availability: Does the activity of the media increase availability? Does media attention amplify the perceived risk for the general public?
  - Credibility of message
  - Repeatability of message
  - The words (discourse) used
  - What about wider risk communication?

Heuristics are the decision rules we use to determine risk ...

- Representativeness: What category does this problem belong to? What is it similar to? Can we stereotype people, situations?
  - Does similarity affect our decision making?
  - When we determine sampling rate how do we consider representativeness?
  - Is sampling random?

Heuristics are the decision rules we use to determine risk ...

- **Control:** Can a person be too confident in their ability to control a given situation and this then influences how they determine risk?
  - Can someone believe they can control an event, an environment even when they do not have the capacity to do so?
  - Conversely can individuals believe that they have no means to control a situation and thus do not take action?

### **Examples of heuristics**

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### **Discussion** points

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### Concluding thoughts

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#### Sally-Ann Krzyzaniak

#### Research Fellow University of Portsmouth

#### Food Fraud and Counter Fraud Best Practice

The Future of Food Safety Conference: Hygiene and Supply Chain Solutions

Sally-Ann Krzyzaniak



#### University of Portsmouth

#### **Speaker Background**

- Research Fellow in Accounting & Financial Management
- Previously worked in the food industry for more than 20 years in nutrition science and regulatory affairs
- Food Fraud Research Group:
  - Cross disciplinary
  - Centre for Counter Fraud Studies and Portsmouth Business School
- Research interests:
  - Food safety governance
  - Food fraud
  - Management control and the food supply chain

#### **Outline of Talk**

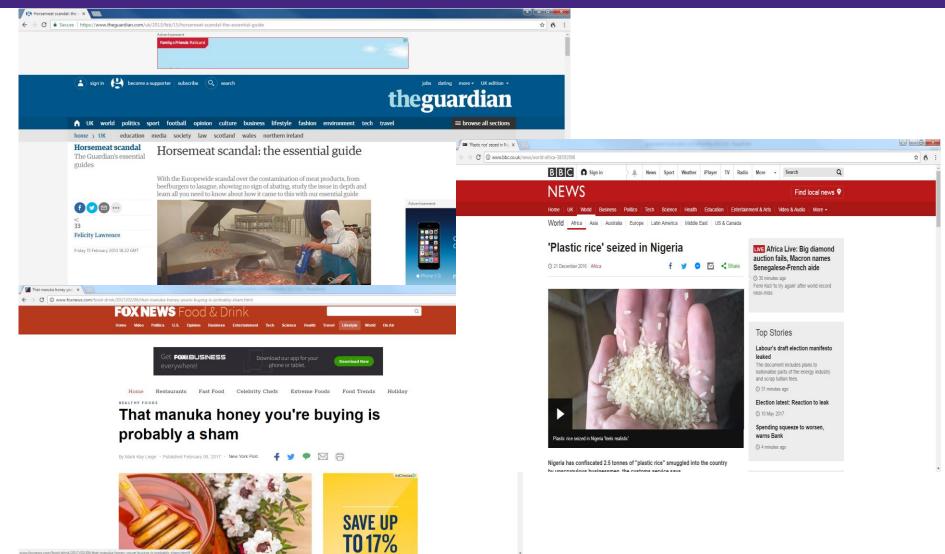


- What is food fraud?
- Cost of fraud
- Counter fraud best practice and using the "Red Flags of Food Fraud"
- Regulatory framework is it enough?





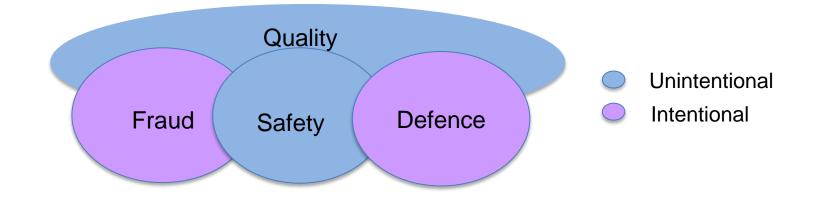
#### **Food Fraud**





#### **Food Fraud**

- Encompasses the deliberate and intentional substitution, addition, tampering, or misrepresentation of food, food ingredients, or food packaging; or false or misleading statements made about a product for economic gain (Spink and Moyer, 2011).
- The customer is deceived in some way.



#### Food Fraud, Food Crime or Fraud in the Food Industry?



• Food Crime - Elliott report

"Food fraud becomes food crime when it no longer involves random acts by 'rogues' within the food industry but becomes an organised activity ......"

"Concerns have been expressed during this review that the term food fraud creates an impression of some kind of low grade infraction of the law, of a harmless minor breach of technical regulations of the kind that many hard pressed businesses may be tempted to resort to in difficult times. But the serious end of food fraud is organised crime, and the profits can be substantial."

- Organised crime or crime that is organised?
- Fraud in the food industry it's not just about adulteration, substitution or mislabelling.

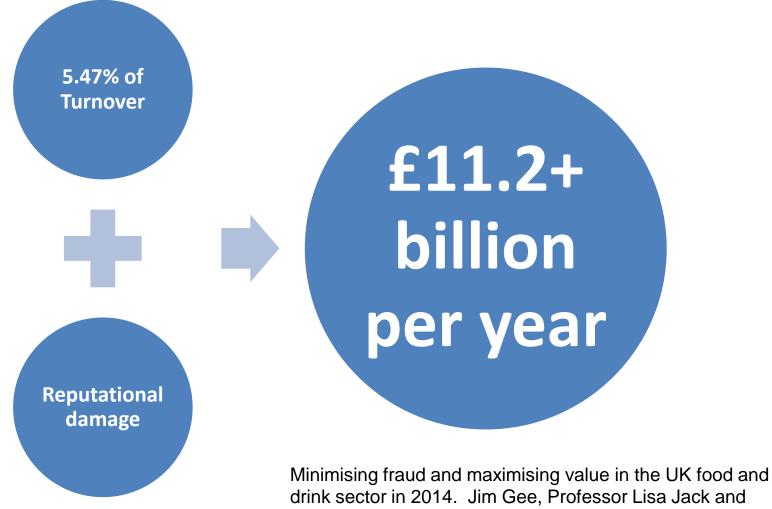


#### Why Worry?

- Safety
- Reputation
- Cost



#### **Financial Cost of Fraud**



drink sector in 2014. Jim Gee, Professor Lisa Jack and Professor Mark Button.

## Food Fraud Rarely Happens On University of University of Portsmouth

- Food safety breaches
- Tax/duty evasion
- Bribery and corruption
- Extortion
- Money laundering
- Funding terrorism
- Smuggling
- False record keeping
- False accounting
- Subsidy fraud
- Other stakeholder fraud
- Grey markets

Tax evasion cuts prices which increases industry pressures which increases chances of food fraud

Businesses risk colluding with criminal activity

#### Into the supply chain



- In order to get into the supply chain of the retailer or caterer, the supplier or distributor must:
  - Make the product in such a way that it passes all diagnostic and visual tests
  - Deceive, collude with, bribe or blackmail someone inside the business
  - Understand the vulnerable points in the supply chain and exploit them
  - Know what paperwork needs to be changed.

## Why are Food Supply Chains Vulnerable?



- Long/fragmentary supply chains
- Short-medium term rather than long-term supplier/customer relationships
- Non-optimal use of information technology systems
- Reliance on marginal costing/pricing
- High volumes of raw materials and goods, widely dispersed
- Lack of information and intelligence sharing
- Inaccurate forecasting
- Multiple ways of invoicing and ordering
- Multiple sources of ingredients
- Imports/exports subject to customs duties
- Different levels of VAT between import and export countries
- Bewildered consumers
- Shelf life demands
- Easily counterfeited labels and packaging

## The ideal product (from a criminal point of view)



Unlikely to be detected (low detection score)

Easy to perpetrate (high ease score)

**Profitable (high profitability)** 



NB: highly profitable can mean

High margin, low volume

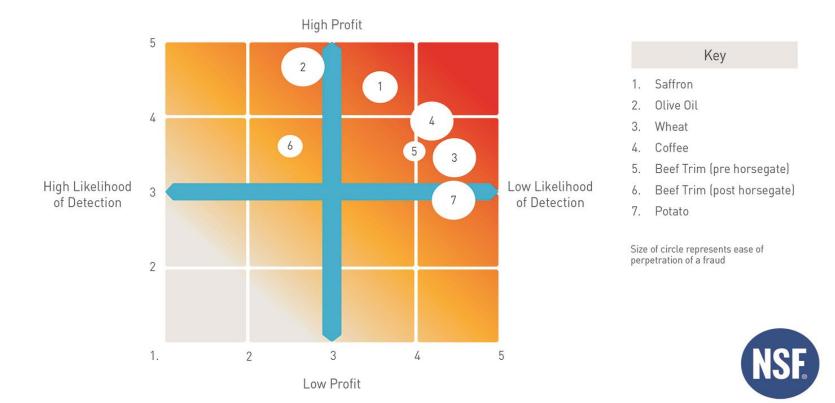
OR

Low margin, high volume



#### Thinking like a criminal







Because food fraud and food crime is economically motivated - there is always money and paperwork involved somewhere.



Collusion, bribery, corruption and blackmail

Inventory fraud

Purchase order frauds

Invoice frauds

Receiving frauds (pick and pack)

Shipping frauds/false consignments

Paperwork frauds.

#### The Red Flags of Food Fraud



#### Unusual features in packaging and labelling

- Agreed specification?
- Agreed standard documentation?
- Staff trained to inspect goods and documentation?

#### Weak internal controls

- No paperwork / too much paperwork
- Checks: too few / not understood
- Little separation of duties

Common underpinning

- Communication
- Consistency of approach
- Training

#### **Combating Fraud in the Food Industry**



**Internal controls** over authorisations, separation of duties, 'checks and balances' and so on.

**Good Corporate Governance** 

Staff training

**Internal audit** 

Whistle blowing mechanisms

#### Sound management controls

- policies and procedures on fraud
- level of tolerance
- sanctions
- reporting requirements
- due diligence on suppliers and employees

#### **CIEH Food Community**





#### Counter fraud good practice for food and drink businesses

Improve fraud resilience and reduce the financial cost of fraud



Written by Eoghan Daly Policy and Technical Adviser, CIEH Food Community Jim Gee Visiting Professor, University of Portsmouth Centre for Counter Fraud Studies

Fano

Scotland

With contributions from Andy Morling Head of Food Crime, Food Standards Agency Ron McNaughton Head of Scottish Food Crime and Incidents Unit, Food Standards Scotland





103 Intellectual Property Office





#### **Regulatory Framework – Enough?**

- Technical breaches of UK Food Safety Act
  - Rendering food injurious to health
  - Selling, to the purchaser's prejudice, food which is not of the nature, substance or quality demanded
  - Falsely or misleadingly describing or presenting food
- Failing to comply with traceability requirements General Food Law
- Challenges and opportunities
  - Common definitions of food fraud and indeed fraud across jurisdictions
  - Investigations must be legally and ethically compliant
  - Resources Trading Standards, Environmental Health, Police
  - Prosecuting any fraud is challenging proving "intent"
  - Information sharing NFCU and Scottish Food Crime and Incidents Unit
    - NFCU hot line "Food Crime Confidential"
  - Using the Proceeds of Crime Act to incentivise prosecutions & act as a deterrent to fraudsters



#### Conclusion

- Initiatives to reduce fraud usually pay for themselves
- Good controls against food fraud are good controls against all fraud
- The majority of people are honest
- Resilient organisations protect their staff, customers and supply chain from the dishonest minority

#### University of Portsmouth

#### **Our Training**

#### **Food Fraud Awareness Online/Face-to-Face**

The cost of fraud to your organisation Understanding food fraud Related crimes Supply chain fraud Food Fraud Temptation Model Counter fraud and forensic accounting -application to food fraud Building resilience to food fraud Detect and prevent food fraud





### Specialist Food Fraud pathway of Association of Counter Fraud Technicians training 20 Credits

Legal awareness Investigation techniques Forensic accounting for detection Building resilience to fraud



Food Fraud Group – Centre for Counter Fraud Studies

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#### Chair Sarah Delaney

#### UK & IE Law and Standards Manager IKEA Ltd

#### **Conference Close**

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