FAMI-QS FEED FRAUD PREVENTION AND DEFENSE MODULE

Since 2004, the FAMI-QS Code of Practice has provided requirements for implementing measures necessary to ensure feed safety and quality of products under its scope. It covers requirements on Good Manufacturing Practices, the HACCP System and continuous improvements to the design, management of operations and risks with a goal of maintaining a high level of quality and feed safety.

Recent scandals in the worldwide food and feed sector have highlighted the need to strengthen fraud prevention measures across the entire supply chain. Not only is this necessary to protect the health of consumers, but corporations and regulators both know that trust is the foundation upon which efficient, functioning markets are built. In addition, there is public concern that the food or feed sector is being used for intentional acts that could harm an individual or the public for ideological purposes (acts of terror).

Specialty feed ingredients are of a high value, given their invaluable intellectual property, R&D and extensive market authorization processes, and lastly, price competition.

At this stage, the principles used for managing feed safety and quality as defined in the FAMI-QS Code of Practice do not provide methods to routinely detect or mitigate feed fraud or terror attacks on operators’ systems or processes.

In order to support our members to better cope with the challenging topic of feed fraud and defense, as well as affording further protection for their brand/ingredients and protecting the society, as of 2018 FAMI-QS has launched works for the development of the FAMI-QS feed fraud prevention and defence module.

The goal of this feed fraud prevention and defense module is to ensure that operators adhering to the FAMI-QS Code of Practice, can implement an auditable system that demonstrates their ability to manage and effectively mitigate the risk of feed fraud and terror.

This module is not a stand-alone auditable document, but rather a tool to be used in conjunction with the FAMI-QS code. Implementing and adhering to the feed fraud prevention and defense module is mandatory for operators choosing to participate in the FAMI-QS certification process.

The FAMI-QS feed fraud prevention and defense module includes:

- **Requirements**: These are mandatory measures, if operators want to adhere to the feed fraud prevention and defense module.

- **Guidance**: The guidance section, following the requirements, includes background information, additional explanations and methods to support operators in implementing the requirements.

- **Templates**: For the implementation of FAMI-QS feed fraud prevention and defense module, FAMI-QS developed specific templates that the operators shall use. The templates will guide you through the process, to develop your vulnerability and fraud assessments. In addition, these templates will support the auditing process.

- **Training**: a dedicated training will be put in place for the implementation of the FAMI-QS feed fraud prevention and defense module. The delivery module for the training will be a blend including e-learning, exams and one (1) day classroom training. The participation in the training is mandatory with a minimum one (1) participant per certified organization. The training will be delivered across
the following regions: Australia, Brazil, China, Europe, India and South East Asia. Specific announcements per region will follow.

For the development of the FAMI-QS feed fraud prevention and defense module (requirements, guidance, templates, training), FAMI-QS has set-up a team of industry experts (see http://fami-qs.org/TF-Supply-Chain-Integrity-Project.html) supported by PwC The Netherlands (PwC). Feed fraud is an issue that requires high level due diligence and specialized expertise. The FAMI-QS feed fraud prevention and defense training experts will work together with PwC.

IMPLEMENTATION DATES:

Given the complexity of the topic, a three (3) years transition period will be given to achieve the compliance with the requirements of the FAMI-QS feed fraud prevention and defense module, starting from the publication date of the module. Module is expected to be published by end of June 2019.

In the next update of the FAMI-QS code version 6.0, the requirements of this feed fraud prevention and defense module will be integrated into the code.

Note: During the audit against version 6.0, the Operator must be able to demonstrate to the auditor their action plan to approach feed fraud and feed defense. It is important that not only the Quality Departments be involved in the process. Prevention of Fraud and defense is not solely an issue of the Quality Department. The FAMI-QS Certified operator shall involve other functions eg: purchasing, sales, procurement, top management, QC.

The action plan towards fraud prevention and defence shall cover the supply chain and the internal processes carried out by the Operator.

Please note that in the absence of the initial actions, as defined above, a major NCR will be raised in regards to Feed Safety and Quality Policy.

For more information about the FAMI-QS feed fraud prevention and defence module please contact: Emmanuel Geneiatakis, ffs@fami-qs.org

About FAMI-QS

FAMI-QS is the global Quality and Feed Safety Management System for the sector of Specialty Feed Ingredients. The code addresses safety, quality and regulatory compliance in order to minimize hazards and ensure the placing on the market of safe and legal Specialty Feed Ingredients. FAMI-QS is operating under IAF MLA.