

Possible fraud control plan

Possible fraud control measure	Source
<p>Business management:</p> <ul style="list-style-type: none"> • Set up an organisation that is able to receive and verify signals (=deviating from what is normal) that indicate the possibility that fraud is committed • Set up an organisation that is prepared for handling a crisis when there is a possibility that feed fraud is committed e.g.: <ul style="list-style-type: none"> – Who should be present in crisis team – Who in the crisis team does what (research, internal and external communication, contact with authorities, contact with clients, contact with suppliers, contact with own processing plants, what kind of control measures are needed, etc. • Organise that new fraud related information (e.g. EWS notifications of GMP+ International, RASFF notifications, newsletters, media attention, information in food/feed fraud databases) is received and processed within the organisation so that adequate action can be taken if needed 	<p>Internal organisation structure GMP+ International EWS</p> <p>GMP+ International newsletters</p> <p>RASFF database</p> <p>USP database</p> <p>Scientific articles</p>
<p>New suppliers / product:</p> <ul style="list-style-type: none"> • Set up a procedure for the approval of new suppliers / producers and new products. Include e.g. <ul style="list-style-type: none"> – Visit / audit the supplier / producer – Verify whether the product and supplier name on the contract, label and other documents accompanying the delivered product is in compliance with the data present in the GMP+ certified company database – Verify whether all relevant supply chain participants are known. E.g. in case the supplier is a trader: request for name and production location of producer – Verify whether the product falls within the scope of the product definition of GMP+ International 	<p>Quality and purchase procedure GMP+ FSP Product List Feed Additives Register EFSA Opinions / publications GMP+ FSP Risk Assessments GMP+ certified Company database National authority Product specification Monitoring program</p>

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<ul style="list-style-type: none"> - Verify whether the product is included in the risk assessment and check if the production process of the product similar to that in the risk assessment - Verify whether the supplier and producer are meeting the GMP+ certified company database: e.g. are they GMP+ certified and is the product included in the scope of the supplier and producer - Check if the supplier and producer comply with legal requirements concerning registration, authorisation and certification 	GMP+ certified Company database
<ul style="list-style-type: none"> - Background check supplier / producer (and possibly other supply chain participants) e.g.: <ul style="list-style-type: none"> ▪ Financial situation ▪ History with feed fraud or involvement with other criminal activities ▪ Check reliability of supplier / producer at reliable sources 	
<ul style="list-style-type: none"> - Document parameters which can give a signal that there is a probability that fraud is committed in e.g. a product specification. These can be chemical, microbiological, physical or other physical chemical characteristics, but also can be e.g. documents, health certificates, certificates of analysis that need to be present when a product is delivered. 	
<ul style="list-style-type: none"> - Include the new product in the monitoring program and include parameters which can give a signal that there is a probability that fraud is committed 	
<p>Current suppliers / producers (or other supply chain participants)</p> <ul style="list-style-type: none"> • Set up a procedure for supplier / producer evaluation. Other supply chain participants can also be included in this evaluation. Include in the evaluation e.g.: <ul style="list-style-type: none"> - Results of the monitoring program (e.g. average values, deviations) - Complaints of customers or own company (e.g. at receiving products) related to this supplier / producer - Delivery performance 	Quality and purchase procedure Supplier evaluation Auditing program

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<ul style="list-style-type: none"> • Set up an audit program for suppliers / producers (or other supply chain participants). Include elements that increase the vulnerability for feed fraud e.g.: <ul style="list-style-type: none"> – Working with night shifts; – Protocol for visitors / third parties (hired for services) – Use of sub-contractors or outsourced producers – Possibility of gaining access to products (e.g. fenced production site / warehouse, sealed transport, closed production lines) – Presence of non-feed products / non-feed activities on the site (e.g. technical grades of the product, biogas fermentation) – Knowledge of the supply chain and origin of the products 	
<p>Purchasing and logistics</p> <ul style="list-style-type: none"> • Verify if the information on the contract is in compliance with <ul style="list-style-type: none"> – Product name, – Name supplier or producer – Name transporting company, – Place of loading 	Purchase procedure Purchase contract Logistic procedure Information in program where purchase contracts are registered
<p>Receiving products</p> <ul style="list-style-type: none"> • Check incoming products for deviations: <ul style="list-style-type: none"> – Visual check whether delivered product is the same as the ordered product – Document check whether the following information is correct: product and supplier name, required documents that should be present (e.g. certificate of analysis, health certificate) – Sample incoming product – Is the transport company correct (is this company expected to transport the product, is the identity of the transporting entity in compliance with the data on the transporting documents) – If available: check if location of loading of the product is correct – If possible / needed: use of test to verify authenticity of the product (monitoring program) 	Receiving procedure Label Documents accompanying the product Monitoring program Information in program where products to be received are registered

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Monitoring program and EWS	Monitoring program
<ul style="list-style-type: none"> Set up a monitoring program in which parameters are included which can give a signal that there is a probability that fraud is committed. These are e.g. analytical techniques or visual checks. Verify if the correct methods of analysis are used 	Laboratory
<ul style="list-style-type: none"> If applicable: verify if the analysing laboratory has the correct authorisation for performing the analysis 	EWS procedure
<ul style="list-style-type: none"> Verify if the correct / authorised method of analyses is applied 	
<ul style="list-style-type: none"> Include the parameters in the EWS procedure that can give a signal there is a possibility that fraud is committed and that are chemically, microbiologically, physically or microscopically analysed or visually checked 	