

GUIDANCE ON AUTHENTICITY OF HERBS AND SPICES

INDUSTRY BEST PRACTICE ON ASSESSING AND PROTECTING CULINARY DRIED HERBS AND SPICES



Delivering Sustainable Growth





Foreword

During the early part of 2015 the Food Standards Agency (FSA) were advised by the Food and Drink Federation (FDF) and the Seasoning and Spice Association (SSA), in liaison with the British Retail Consortium (BRC), that there was concern in Canada and the United States after certain batches of ground cumin and paprika tested positive for undeclared peanut protein. This represented a significant public health risk to people with nut allergies. The level of contamination suggested that the products had most likely been adulterated with cheaper materials for financial gain.

Both industry and the FSA launched sampling programmes in the UK and whilst we identified low levels of peanut and almond consistent with adventitious cross-contamination in some of the spice products tested, we did not find any evidence of large scale adulteration.

Recognising the severity of the situation in North America, we decided to meet with representatives from across the food industry at a specially organised workshop. The purpose of this workshop was to determine if potential weaknesses in supply chains associated with dried herbs and spices in the UK did exist and to discuss what further measures might be needed to strengthen consumer protection across this sector.

The workshop focussed on identifying steps within a variety of supply chains where there might be opportunity for fraudulent practices involving adulteration and substitution. Solutions for addressing these vulnerabilities were also explored and ways of mitigating potential threats to product integrity were identified.

A key recommendation arising from this workshop was that an expert Joint Industry Working Group should be established to develop best practice guidance for UK businesses, which would provide advice on how to identify vulnerabilities in their supply chains and the types of preventative measures they could consider.

I am pleased to say that as a result, representatives from the BRC, FDF and SSA have developed the following guidance. The document is intended as a practical and easy-to-read guide with the focus on protecting the integrity of food and food supply chains in this sector.

No process can guarantee that food businesses are not the target of fraudulent activity but the use of this document can make it less likely. Therefore, I encourage small and large food businesses alike to study the contents of this guidance as it could prevent future public health risks, give us the confidence that the foods we eat are what they say they are as well as protecting the reputation of this important and complex food sector.

Finally, I would like to thank all those involved in the production of this document. This particular collaborative approach is a really good example of incident prevention and engagement across industry, the Food Standards Agency and Food Standards Scotland.

Catherine Brown

Chief Executive Food Standards Agency

1. Introduction

The global market for herbs and spices is complex with diverse supply chains and products being sourced from a variety of businesses ranging from large scale producers to smallholders. Many herbs and spices grow wild and are farmed on a village or subsistence scale and there are often many intermediaries in the supply chain from farmer, collector to middle-man before arrival at the origin processor/shipper (see for example the Supply Chain Map in Annex II). Protection against adulteration and substitution is of the upmost importance given that many herbs and spices are materials that may be of high intrinsic value. Food businesses need to ensure that they have appropriate controls and mitigation measures in place to prevent or detect product vulnerabilities. As with any raw material and its supply chain, the emphasis should always be on prevention rather than detection of issues. As each herb and spice is unique, this document concentrates on identifying and assessing general vulnerabilities.

This Guidance was developed by a Joint Industry Working Group comprised of representatives of the British Retail Consortium, Food and Drink Federation and Seasoning and Spice Association, in liaison with the Food Standards Agency and Food Standards Scotland.

1.1. Scope

This document has been developed to provide Industry Best Practice Guidance on vulnerability assessment for culinary dried herbs and spices¹ (including blends), in order to mitigate against potential adulteration and substitution. It is focussed on the authenticity of herbs and spices and therefore does not cover general food safety controls. However, food safety and labelling requirements still apply². It is prudent for users also to consider the potential for crosscontamination as a part of Good Agricultural and Manufacturing Practices, which are beyond the scope of this document (See Section 6 for useful links to further information).

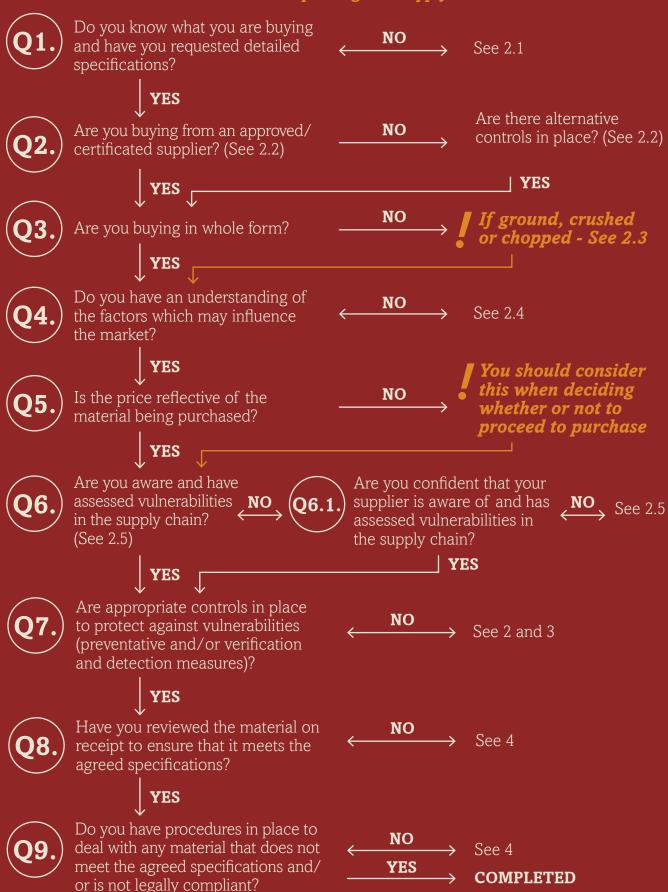
1.2. How to Use the Guide

This guide is intended to facilitate the sharing of best practice and elements of it will assist companies using herbs and spices in understanding their role in assuring the integrity of their products. It has been developed from the perspective of providing an oversight of the whole supply chain, from sourcing to placing the product on the market, whether to businesses or to the final consumer. The document has been written from the perspective of UK industry but the principles will apply to businesses globally. It is important for businesses to consider the regulatory requirements and responsibilities for the market in which they are trading. The Decision Tree will lead you through this Guidance.

¹ See ESA List of Culinary Herbs and Spices for major, most commonly traded products in the EU: http://www.esa-spices.org/download/esa-list-of-culinary-herbs-and-spices.pdf.

² See FSA website: http://www.food.gov.uk/enforcement/regulation/foodlaw

1.3. Decision Tree to Protect Herbs and Spices against Supply Chain Vulnerabilities



NB: Assessment of Supply Chain Vulnerabilities is an ongoing process which requires regular review.

Every part of the supply chain has a role to play in assuring product integrity, whether as growers, primary processors, herbs and spices agents and brokers, packers, food manufacturers, retailers, foodservice operators or wholesalers/cash and carry businesses. The principles of this Guidance can be used by any part of the supply chain. Brand owners will wish to consider their specific legal responsibilities for the safety and authenticity of their products when using this guide. Companies should also ensure that they have strong links between procurement and regulatory/technical functions.

2. Preventative Measures

2.1. Product Specification

The foundation of any purchasing agreement is a comprehensive specification which allows clear understanding of the nature and detail of the food in question.

Detailed specifications should include:

- Botanical species this is a key indicator which allows differentiation between two similar products. For example, in case of cassia and cinnamon, the species determines the genuine ingredient. For more information please refer to the European Spice Association List of Culinary Herbs and Spices.
- Full description of the product, declaration of any "standardization processes" and all ingredients should be listed. In developing your product specification, you should also take into account any claims made on the final product (e.g. organic or origin) and any known cross-contamination or allergen risks.
- Key attributes eg: Volatile Oil Content; Piperine for pepper; Curcumin for turmeric; ASTA units for paprika; Scoville Heat Units (or Capsaicin content) for chillies; Colouring Strength/Safranal content for saffron; and Physical Attributes (e.g. particle size, grade, bulk density).
- For further reference, Annex 1 provides examples of types and methods of adulteration, including recommended controls.

2.2. Supplier Assurance

Supplier assurance is an important factor in ensuring the integrity of products and may encompass the following:

- Using approved/certificated suppliers (e.g. a GFSI approved scheme such as the BRC Global Standard) may assist with the objective of building a secure, assured supply chain;
- Based on identified risks, targeted audits of the supply chain to ensure visibility and transparency as to the original source of the raw material, processing, ownership and storage at each point in the supply chain; and
- Good Agricultural and Manufacturing Practices (e.g. storage, segregation).

2.3. Product Type

For ground, crushed or chopped materials it is critical to know where the first and any subsequent such process took place and who owned the material at point of size reduction. Grinding or blending of rubbed herbs and spices is the point in the supply chain where the greatest risk of adulteration can occur and knowledge of ownership of the product at this point in the supply chain forms a key part of the risk assessment. As historically evidenced, reduction of particle size can hide adulteration and make it more difficult to detect. Dependent on the exact nature of the adulterant, suitable analytical methods to identify adulteration may already be available or may be under ongoing development.

2.4. Knowing Your Supply Market

Having an understanding of the factors which may influence the market will assist you in building preventative measures into your purchasing decisions. Factors which you may wish to consider include:

- Being aware of and understanding the trading market, e.g. seeking clarification if ground product is being offered below the market price of whole product as this could suggest that the product purity is in question and further investigation may be required. Market intelligence data to track price trends is available, often as a subscription service.
- Being aware of the harvest cycle which can influence availability and quality
 (See Typical Harvest Chart at Annex III). In general terms, new crop material typically
 arrives in the UK/EU two months or more after the commencement of harvest. Therefore,
 if a producing origin suffers from some type of extraordinary event (e.g. hurricane) the
 supply can be affected either immediately or up to 18 months later, dependent on the
 pipeline stock position.

2.5. Understanding Vulnerabilities in Your Supply Chain

Knowing your supply chain is a key factor in understanding vulnerabilities and mitigating against them. This is an ongoing process which requires regular reviews according to the most updated and available market information. To map your supply chain from a food authenticity perspective, consider possible vulnerabilities at each stage of the supply chain (See Annex II) and take into account the following points:

- Number of countries/regions/places and intermediaries through which the original ingredient has been processed or transited – ensure visibility and transparency of your supply chain;
- History of fraud for a particular ingredient/category of ingredients, as this can point towards possible future vulnerabilities.
- Seasonality and availability of supply (See Typical Harvest Chart at Annex III).
- Weather events or natural disasters (i.e. drought, flood, earthquakes) that may impact supply availability.
- Cultural and geo-political events (i.e. food security, terrorism, political instability) which may impact on the global supply chain of herbs and spices.
- Economic indicators making fraud more attractive.
- Food safety laws and their enforcement (i.e. the level of advancement of food controls and regulatory frameworks).

- Prevalence of corruption or any other cultural influences on business ethics.
- Advances in technology to mask food fraud.
- Additionally bear in mind the time-lag from events that may impact supply availability to noticing/identifying a food fraud issue could be as much as 12-18 months, based on time to market for some crops.

Once you have mapped your supply chain from a food authenticity perspective and identified vulnerabilities you should assess and prioritise your findings and take action to mitigate the identified risks. Mitigating actions may include the preventative measures set out in Section 2 as well as the verification and detection measures set out in Section 3. The Assessment of Supply Chain Vulnerabilities is an ongoing process which requires regular review.

3. Verification and Detection Measures

Prevention is always better than detection. Testing may be used to verify that preventative measures are effective and may assist in detecting issues but should not be relied on as a single control point.

3.1. Sampling and Inspection Programmes

Sampling and inspection programmes should be informed by knowledge from supply chain assurance activities as well as known vulnerabilities and horizon scanning activities (See Annex II).

You should use a recognised statistical sampling and inspection approach, which is appropriate for the substance being tested/inspected, fit for purpose and applied consistently, to ensure that the sampling is representative of the batch.

The European Spice Association's 'Quality Minima Document' describes key parameter limits for dried herbs and spices to inform purchasing of these products for further processing within the EU, and also lists some recommended analytical methods (see Section 6: Additional References).

3.2. Devising a Testing Strategy

It is important that you are clear about the objective of testing and what information you hope to obtain, as this will help you understand whether testing is necessary, to devise a suitable testing strategy and select a test capable of meeting your requirements.

Factors to consider in selecting an appropriate test method include the:

- type of material to be tested and how the sample will be selected; and
- suitability of available test methods, including their limitations.

The type of material being tested (the matrix) can have a considerable effect on the ability to accurately detect and, where applicable, quantify the substance of interest. A test may also indicate that a substance is present when it is not, for example, due to cross-reactivity with other related species. Some cross-reactivity will be known and therefore predictable but this is not always the case.

Herbs and spices are potentially one of the most complex and challenging matrices to analyse as they may be highly coloured and can contain chemically reactive components. These challenges are increased with blended products, which may bring about other chemical changes, and equally with composite products containing herbs and spices due to the added complexity of the matrix.

There will be cases where suitable and accurate testing methods are not currently available for the matrix of interest and the focus of assurance activity will therefore be on preventative measures.

3.3. Selecting a Test Method and Laboratory

Having an informed dialogue with your testing laboratory should give you the confidence that:

- the laboratory is appropriately accredited and competent to perform the test on the required matrix;
- the test method is appropriate for the matrix to be tested and meets your testing objectives; and
- you understand how the results of the test will be reported, to assist you in interpreting the results.

The laboratory should be able to provide assurances that the test method is appropriate.

Further information on suggested criteria for an organisation to be mindful of when employing the services of a laboratory/analytical service is available in Defra's Authenticity Methods Working Group's response to the Elliott Review (See References).

3.4. Supply Chain Verification Measures

In addition to companies' own checks, verification measures may include:

- Submission of pre-delivery samples for approval prior to purchase and/or approval on arrival; and
- Evidence of authenticity by the provision of appropriate test certificates from the supplier (using approved methods and accredited laboratories when possible), traceable to the batch codes and confirming conformance to specification parameters.

4. Receipt of Material

You should review the material on receipt to ensure that it meets the agreed specification [See also Section 3.1 on sampling and inspection programmes].

Non-compliant materials should be disposed of or returned to the supplier in a timely manner.

Reporting issues with food safety consequences to the authorities is a legal obligation under EU legislation. Businesses should be aware of the regulatory requirements for all countries in which they trade.

Even in cases where you are not legally required to report an issue to the authorities, if you encounter a food integrity or authenticity issue with a product, you should consider whether there is merit in sharing information about this with the authorities. Equally, it is good practice to share information about issues encountered with trade associations or appropriate bodies to inform industry risk assessments.

5. Glossary

Adulteration

Adulteration is the deliberate and intentional inclusion in herbs and spices of substances whose presence is not legally declared, is not permitted or is present in a form which might mislead or confuse the consumer, leading to an imitated food and/or a product of reduced value, as well as the deliberate and intentional removal of any valuable constituent from a spice or herb.

Blending/Mixing

Spices and herbs provide a distinct, characteristic colour and/or flavour to food but, being a natural product, these can vary depending on where they are grown, weather conditions, crop season and other natural reasons. The blending together of different qualities of the same ingredient in order to reduce the natural variation in the aromatic profile (so called "standardization") cannot be considered adulteration.

In other cases, blending together different qualities of the same ingredient can be done in order to achieve specific results (e.g. more or less pungency, improved machinability, improve colour). This cannot be considered adulteration either (see also Annex I).

Extraneous matter

Extraneous matter is the term used to describe the presence of plant parts that are not the required one, for example stems or seeds in a leaf product. The European Spice Association's (ESA) Quality Minima Document sets a maximum level of extraneous matter at 1% for spices and 2% for herbs. These levels can normally be achieved through a combination of Good Agricultural Practice followed by thorough physical cleaning (Good Manufacturing Practice).

Spent, partially spent or exhausted material

Spent, partially spent or exhausted material is the by-product of essential oil or oleoresin production.

By-products may have lost their intrinsic bioactive characteristics completely or partially depending on the extraction method applied.

Standardization

See Definition for 'Blending/Mixing'

Brokers

Companies that purchase or "take title" to product for resale to manufacturers, other brokers, retailers or food service companies but not directly to the consumer. They take legal responsibility under General Food Law and are considered to be a Food Business Operator under the terms of General Food Law

Agents

Non-manufacturing service providers that trade between a manufacturer or broker but do not take title to the products. Such companies provide a range of services to facilitate the safe and legal trade of products.

Importers/Exporters

Companies that facilitate the movement of products across national boundaries satisfying legal and customs requirements. Importers and exporters may also be agents and/or brokers.

6. Additional References

Food Authenticity

Defra Authenticity Methods Working Group Response to Elliott Review on 'Integrity and Assurance of Food Supply Networks'

- **Box 2**: Some Examples of Criteria for a 'Fit for Purpose' Analytical Laboratory
- Box 3: Six Principles of Analytical Best Practice to Achieve 'Fit for Purpose' Analytical Procedures https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/409253/amwg-elliott-response.pdf

ESA Quality Minima Document:

http://www.esa-spices.org/download/esa-qmd-rev-5-september-2015-sc-update-as-per-esa-tc-27-10-15.pdf

FDF Authenticity Guide:

http://www.fdf.org.uk/food-authenticity.aspx

The U.S. Pharmacopeial Convention (USP) Guidance on Food Fraud Mitigation:

http://www.usp.org/sites/default/files/usp_pdf/EN/fcc/Notices/guidance_on_food_fraud_mitigation.pdf

BSI Standard for Sampling Procedures for Inspection

http://shop.bsigroup.com/Browse-By-Subject/ Quality--Sampling/Full-list-of-statistical-standards/ Acceptance-Sampling-Schemes/

Food Safety and Labelling

FSA Guidance on Allergen Management and Consumer Information

http://www.food.gov.uk/sites/default/files/multimedia/pdfs/maycontainguide.pdf

Hazard Analysis and Critical Control Points (HACCP)

http://www.food.gov.uk/business-industry/foodhygiene/haccp

Safer Food Better Business (SFBB)

https://www.food.gov.uk/business-industry/sfbb

Guide to Protecting and Defending Food and Drink from Deliberate Attack PAS 96:2014

http://www.food.gov.uk/sites/default/files/pas96-2014-food-drink-protection-guide.pdf

Safe and Local Supplier Approval (SALSA)

http://www.salsafood.co.uk/

Good Agricultural and Manufacturing Practice

Good Agricultural Practices

http://www.esa-spices.org/download/iosta-gap-final.pdf

Codex Code of Hygiene Practices for Spices and Dried Aromatic Herbs CAC/RCP 42-1995

http://www.fao.org/fao-who-codexalimentarius/download/standards/27/CXP_042e_2014.pdf

FSA Imported FoodTrade Information Sheet No 9 – Herbs and Spices

http://www.food.gov.uk/sites/default/files/multimedia/pdfs/tradeinfo09.pdf

UK Competent Authorities

Food Standards Agency - Food Incidents

http://www.food.gov.uk/business-industry/food-incidents

Food Standards Scotland - Food Incidents

http://www.foodstandards.gov.scot/food-safety-standards/food-incidents

National Food Crime Unit -Reporting food fraud

http://www.food.gov.uk/enforcement/the-national-food-crime-unit/foodfraud

DEFRA - Food Authenticity

https://www.gov.uk/government/groups/food-authenticity-steering-group

APPENDICES

Annex I - Types and Methods of Adulteration, including Recommended Controls

This table sets types and methods of adulteration, including recommended controls. Please note where a product is adulterated with an allergen or non-food product, it becomes a food safety issue.

Types of Adulteration	Methods of Adulteration	Recommended Controls may include
Extraneous matter from the same plant	Non-functional parts of the plants, typically added at the grinding/blending stage (e.g. deliberate addition of sticks and stems in ground black pepper)	Visual inspection, microscopy and/or analysis to meet the standards defined in the ESA Quality Minima Document (e.g. extraneous vegetable matter - EVM - of 1% for spices and 2% for herbs; Volatile Oil Content)
Extraneous matter from a different plant	Parts of other plants of similar appearance, typically added at the cutting/grinding/blending stage (e.g. deliberate addition of foreign plant material in oregano)	Visual inspection, microscopy and/or analysis to meet the standards defined in the ESA Quality Minima Document (e.g. EVM of 1% for spices and 2% for herbs; Volatile Oil Content)
Exhausted also referred as spent, defatted and depleted material * spent material should not go back into the supply chain and should not be used in blending unless declared	Undeclared addition of by-product of essential oil, oleoresin and extrusion extraction at grinding/ blending stage (e.g. same plant but without bioactive principle – spent cumin in ground cumin)	Visual inspection, microscopy and/or analysis to meet the standards defined in the ESA Quality Minima Document (e.g. Volatile Oil Content; Residual Solvents Analysis)
Colour enhancement	Addition of non-permitted or undeclared colour at grinding/blending stage (e.g. Sudan dyes in capsicums, oleoresin turmeric in ground turmeric)	Analysis by LCMS-MS/HPLC
Misrepresentation	Substitution with similar material of lower commercial value (e.g. undeclared cassia for cinnamon, safflower for saffron)	Analysis of key attributes (e.g. coumarin content in cassia or microscopy for safflower in saffron)
Bulking	Addition of undeclared bulking agents at grinding/ blending stage (e.g. starch in turmeric); potential for introduction of undeclared allergens (e.g. peanut protein through use of husks)	Analysis of key attributes (e.g. iodine for starch) e.g. ELISA/ PCR for detection of allergens

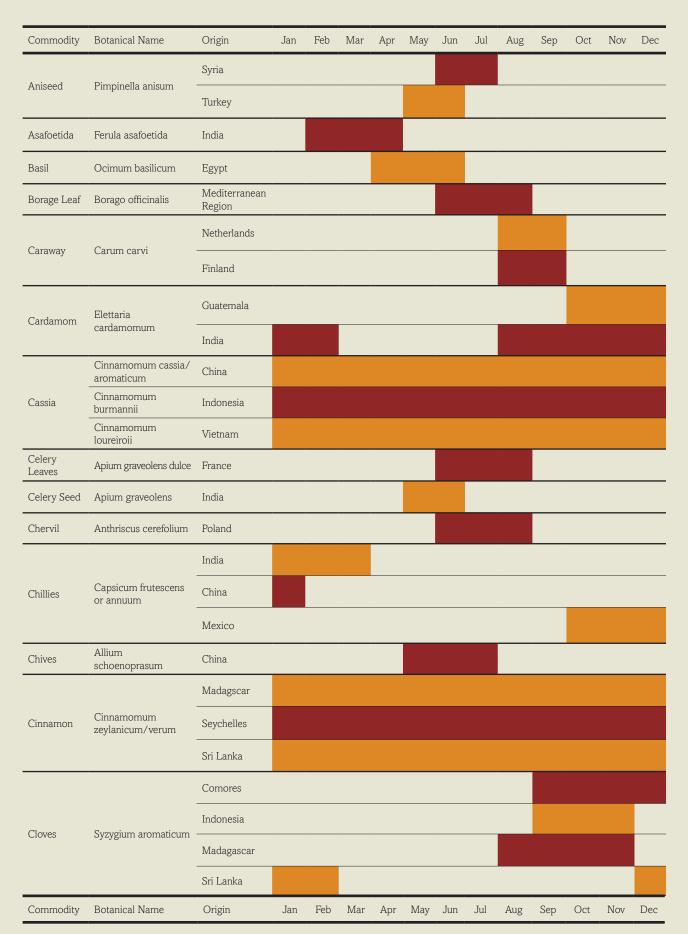
EXAMPLES OF

Annex II - Generic Supply Chain Map for Herbs and Spices with Examples of Fraud Vulnerabilities

SUPPLY CHAIN STAGES **VULNERABILITIES** Adding non-functional parts of the plant ∫ → Loss of traceability Adulteration at the grinding stage, (See Section 3) PROCESSOR Deliberate misrepresentation Adulteration (See Section 3) PROCESSOR Purchase of low grade material / mislabelling Purchase of low grade material / mislabelling Purchase of low grade material / mislabelling PROCESSOR / Substitution Knowingly placing mislabelled product on the market **MANUFACTURE** WHOLESALER CONSUMER

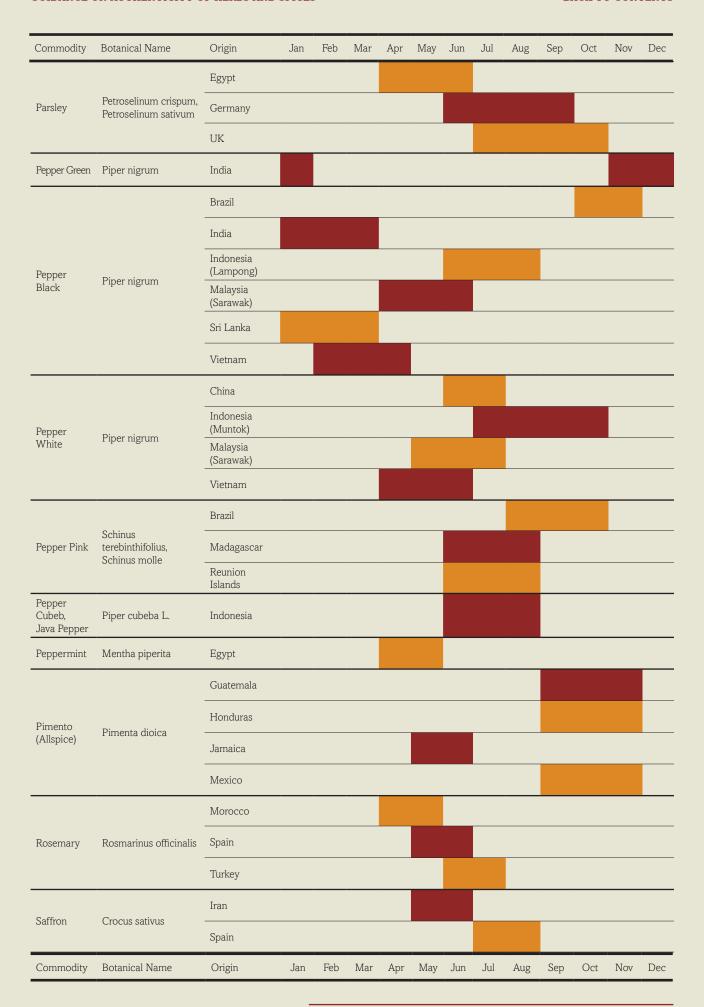
NB: Additional steps may take place during the supply chain e.g. blending. Consideration should also be given to typical food safety vulnerabilities which are not included in this diagram.

Annex III – Typical Harvest Charts (Major Products and Origins)



Commodity	Botanical Name	Origin	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Coriander Leaf Coriandrui	Coriandrum sativum	Egypt												
	Conditionalli Sativani	UK												
		Bulgaria												
		Canada												
		Egypt												
Coriander Seed	Coriandrum sativum	India												
		Morocco												
		Romania												
		Russia												
		China												
		India												
Cumin Seed	Cuminum cyminum	Iran												
		Syria												
		Turkey												
		India												
Curry Leaf	Murraya koenigii	Sri Lanka												
Dill Seed	Anethum graveolens, Anethum sowa	India												
Dill Tops	Anethum graveolens	Poland												
		Egypt												
Fennel Seed	Foeniculum vulgare	India												
Fenugreek	Trigonella foenum-	Egypt												
Seed	graecum	India												
Galangal	Alpina officinalis, Alpina officinarum, Keampferia galangal	Thailand												
Garlic	Allium sativum	China												
		China												
Ginger	Zingiber officinale	India												
		Nigeria												
Commodity	Botanical Name	Origin	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec

Commodity	Botanical Name	Origin	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Grains of Paradise	Aframomum melegueta	W Africa				1				0	r			
Juniper Berries		Italy												
	Juniperus communis	Macedonia												
Kaffir Lime Leaf	Citrus hystix	Thailand												
Laurel (Bay) Leaves	Laurus nobilis	Turkey												
Lavender Flower	Lavandula officinalis	UK												
Lavender Leaf	Lavandula officinalis	UK												
Lemongrass	Cymbopogon citratus	Thailand												
Lovage Leaf	Levisticum officinale	Poland												
Lovage Root	Levisticum officinale	Poland												
	Myristica fragrans,	Grenada												
Mace	Myristica argentea	Indonesia												
Marjoram	Majorana hortensis, Syn. Origanum majorana	Egypt												
Mexican Oregano	Lippia graveolens	Mexico												
		Canada												
Mustard Seed	Sinapis alba, Sinapis nigra, Brassica nigra, Brassica juncea	India												
	J	Russia												
Nigella Seed (Kalonji seed)	Nigella sativa	India												
		Grenada												
NI	M. Carlos Common	India												
Nutmeg	Myristica fragrans	Indonesia												
		Sri Lanka												
Onion and	Allium cepa & Allium	Egypt												
shallot	cepa var. aggregatum	India												
Oregano	Origanum vulgare, Origanum onites	Turkey												
		China												
Paprika	Capsicum annum or frutescens	Peru												
		Spain												
Commodity	Botanical Name	Origin	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec



Commodity	Botanical Name	Origin	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Sage	Salvia officinalis, Salvia triloba	Turkey												
Sumac	Rhus coriaria	Turkey												
Savory Summer	Satureja montana	Albania												
Savory Winter	Satureja hortensis	Albania												
Szechuan Pepper	Zanthoxylum piperitum	China												
Spearmint	Mentha spicata	Egypt												
Star Anise	Illicium verum	China												
	illiciani verani	Vietnam												
Tarragon	Artemisia dracunculus	France												
Thyme	Thymus vulgaris, Thymus zygis, Thymus serpyllum	Morocco												
Tilyine		Spain												
		Ethiopia												
		India												
Tumeric	Curcuma longa	Indonesia												
		Myanmar												
		Vietnam												
Vanilla	Vanilla planifolia, Vanilla tahitensis	Madagascar												

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British Retail Consortium

| www.brc.org.uk

Food and Drink Federation

| www.fdf.org.uk

Seasoning and Spice Association

| www.seasoningandspice.org.uk



