

# 1 **Integrity in the fresh produce supply chain: solutions and approaches** 2 **to an emerging issue.**

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5 Food fraud is the misrepresentation of food in terms of labelling or documentation.  
6 The fresh produce supply chain is global with fresh produce grown many  
7 thousands of miles from the point of purchase and consumption. Long supply and  
8 complex fresh produce supply chains provide opportunity for fraudulent activity  
9 to occur especially further processing or re-packing of products to mask opaque  
10 practice and non-compliant behaviour. Price premiums for products designated as  
11 ‘high-value’, for example, organic produce, produce of particular provenance, or  
12 geographical production area provides motivation for less scrupulous actors to  
13 present for sale, produce that is mislabelled or misrepresented. People integrity as  
14 well as data, product and process integrity are gaining wider attention in the  
15 horticultural sector. Types of fraud critiqued in this review paper include  
16 mislabelling, substitution or misrepresentation of origin (country or regional  
17 location), method of production (organic or conventional) or incorrect varietal  
18 declaration. These challenges and the existing and emerging technologies that are  
19 both used within a quality assurance programme and alternatively used by  
20 regulators when investigating potential instances of fraudulent behaviour are  
21 considered. New methodological solutions and approaches are emerging and such  
22 techniques will develop rapidly to meet the growing challenge of fraud and to  
23 ensure consumer trust in the industry is maintained especially as types of food  
24 fraud evolve and become more sophisticated.

25 Keywords: produce, integrity, food fraud, substitution, provenance

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28 **1. Introduction**

29 Food fraud is the misrepresentation of food in terms of labelling or documentation  
30 i.e. the food is not what it is purported to be. Fraudulent mis-description on food product  
31 labels is a widespread problem, particularly with high added-value products commanding  
32 a premium price (Woolfe and Primrose, 2004:222). Food fraud is ‘deliberately placing  
33 food on the market, for financial gain, with the intention of deceiving the consumer’  
34 (Elliott Review, 2013). Food fraud can lead to food safety issues, but in the food industry  
35 food fraud is increasingly seen as a different challenge to food safety problems. This  
36 means that in order to reduce the likelihood of occurrence and also to reduce the impact  
37 should an incident occur countering the risk of food fraud requires both similar and  
38 alternative methods to those that are currently used to address food safety risk.

39 The types of fraud critiqued in this review paper include mislabelling, substitution  
40 or misrepresentation of origin (country or regional location), method of production  
41 (organic or conventional) or incorrect varietal declaration. The aim of this work is to  
42 consider the challenges and the existing and emerging technologies that are both used  
43 within a quality assurance programme and alternatively used by regulators when  
44 investigating potential instances of fraud. Fresh produce sold in the European Union  
45 (EU) is of particular interest here because of the need for market compliance with EU ten  
46 specific marketing standards for ten types of fresh produce where criteria such as class  
47 (quality attribute), variety and country of origin must be truthfully ascribed (Gov.uk,  
48 2019). Thus, there is a clear financial motivation for perpetrators of fraud to substitute  
49 alternative products with different varietal attributes or geographic origin where existing  
50 quality control methods would find it difficult to identify that such substitution has taken  
51 place. In the years 2016-18 there were fifty-nine notification for fruit and vegetables for  
52 “adulteration/fraud” within the Rapid Alert System for Food and Feed (RASFF) Database

53 linked to problems such as illegal importing, absence of health certificate(s), Common  
54 Entry Documents (CED) and certified analysis reports and improper health certificates  
55 that were signed before the analysis was performed (Source: RASFF, nd). Examples of  
56 non-compliant products included dried figs from Turkey; frozen okra, curry leaves and  
57 red chilli from India; raisins from Iran and Turkey; dried beans and watermelon seeds  
58 from Nigeria; fenugreek from Ethiopia, dragon fruit from Vietnam, and peppers from  
59 Egypt.

60           Global supply chains are becoming more sophisticated and complex, and together  
61 with the potential for weak governance, this means that the low probability of discovery  
62 or the low severity of punishment or sanctions provides an incentive for perpetrators to  
63 commit food fraud (Sarpong, 2014; Pustjens et al. 2016). However, food fraud may also  
64 be motivated as a mechanism to appear to meet stated customer (retailer or food service)  
65 requirements e.g. substituting ingredients to meet supply chain constraints and barriers  
66 (Kowalska et al. 2018). The constraints and barriers identified in the literature that drive  
67 this mendacious behaviour include, first, regulatory or political pressures, and then supply  
68 chain pressures. These supply chain pressures include: economic, competitive or coercive  
69 dynamics; information asymmetry with associated power concentration with specific  
70 actors; data swamping, opacity i.e. a lack of visibility; or organisations being time poor  
71 and looking for quick solutions to deliver value in the supply chain (Manning, 2016;  
72 Manning et al. 2017). Indeed, reasons for mislabelling of fresh produce whether  
73 intentional or unintentional might be due simply to human error, a lack of verification  
74 during product labelling changes in production system or even an error in original artwork  
75 design (Kowalska et al. 2018). Changes in the fresh produce supply chain that increase  
76 vulnerability and risk include: globalisation, especially where horticultural production  
77 takes place in countries with lower regulatory standards and governance; more

78 prescriptive food safety management standards; the impacts of climate change on supply  
79 and demand dynamics; and transitions in food culture and consumer behaviour (Kleter  
80 and Marvin, 2009; Jacxsens et al. 2010; Marvin et al. 2016) Further factors that influence  
81 fresh produce chains have been synthesized (Table 1).

## 82 **Take in Table 1**

83 It is arguable that, to date, fresh produce food safety has had a higher profile than  
84 fraudulent activity. There has been more focus on the direct risk to consumer health of  
85 inadequate production practices being linked to foodborne illness outbreaks (FIOs).  
86 These FIOs can be large, with fresh produce accounting for 10% of FIOs in the European  
87 Union from 2007 to 2011, 26% of individual illness cases, 35% of hospitalisations, and  
88 46% of deaths (EFSA, 2013). In response, production standards have been developed that  
89 follow the principles of hazard analysis and critical control point (HACCP) systems and  
90 apply a systems-based approach to managing food safety (Gil et al. 2015; Monaghan et  
91 al. 2017). Growers are required by many customers to adhere to a quality assurance  
92 scheme (QAS), either an industrywide QAS such as Red Tractor Assurance (RTA, 2017)  
93 or a customer-specific QAS such as McDonald's good agricultural practices (GAP)  
94 guidelines (McDonald's Corp., 2012). However, these systems rely heavily on a  
95 formalised system to show that actions are being completed and as a result there is a  
96 difference between developing and developed countries in the efficacy of food safety  
97 control systems employed (Faour-Klingbeil and Todd, 2018)

98 Food integrity has been defined as ensuring that food which is offered for sale is  
99 not only safe and of the nature, substance and quality expected by the purchaser, but also  
100 considers other aspects of food production, such as the way it has been sourced, procured  
101 and distributed and being honest about those elements to consumers (Elliott, 2014). Thus,  
102 developing supply chain systems and standards that assure food integrity will enhance

103 food safety, authenticity, quality, and increase consumer trust in product claims (Kleboth  
104 et al. 2016; Goddard et al. 2018). Integrity in the horticulture supply chain is driven by  
105 consumers who demand that the produce they purchase is firstly, what it purports to be  
106 (product integrity); secondly is produced in line with defined standards (process  
107 integrity); thirdly that these standards address ethical corporate behaviour (people  
108 integrity); and finally the data associated with the produce (data integrity) is valid and  
109 reflects the intrinsic and extrinsic characteristics of the product (Manning, 2016;  
110 Manning, 2018). Thus developing product integrity and traceability protocols can  
111 underpin product integrity, trust and an open and transparent supply network (Soon et al.  
112 2019).

113         The differentiation of fresh produce as previously described at the production and  
114 retail level provides opportunity for certain types of food fraud such as economically  
115 motivated substitution or mislabelling to occur. Economically motivated substitution  
116 could also happen when produce from one country of origin is substituted for another  
117 product from a different source especially if the produce is visually similar and there is a  
118 large price differential between the produce from the claimed source and the source being  
119 substituted. Further, the additional value derived in differentiating between  
120 conventionally grown products and organic production means that there is an  
121 economically motivated opportunity to substitute conventional for organic produce and  
122 label this as organic. Examples of reported cases of mislabelling and misrepresentation  
123 have been collated to show the types of fraud that can occur (Table 2).

124         **Take in Table 2**

125         Product identity from source through to processing/packing and distribution has  
126 been aligned with notions of traceability (Bertolini et al. 2006); a so-called ‘chain of  
127 custody’ (Thakur and Hurburgh, 2009). Indeed identity preservation is becoming an

128 increasingly important credence or process attribute that adds economic value to a product  
129 (Dabbene et al. 2014). Regulation EC/178/2002 defines traceability as the ability to trace  
130 and follow a food, feed, food-producing animal or substance intended to be, or expected  
131 to be incorporated into a food or feed, through all stages of production, processing and  
132 distribution. In high information input and complex supply chains such as fresh produce,  
133 the market requirements for identity preservation and traceability often need to exceed  
134 the legislative requirements for ‘one step back-one step forward’ processes (Manning,  
135 2017). Thus, an effective traceability system should establish and enable the identification  
136 of product lots and their relation to batches of raw materials, processing and delivery  
137 records (BS EN ISO 22000:2005).

138         Industry mechanisms to ensure that identity preserved products are what they are  
139 purport to be include the use of business to business (B2B) or business to consumer (B2C)  
140 supply chain standards. B2C standards through associated cues on packaging such as  
141 organic certification logos, geographic indication [British flag or country of origin  
142 designation], method of production [Red Tractor] and the associated traceability and mass  
143 balance checks i.e. extrinsic product characteristics, need to be verified in order to ensure  
144 consumer trust (Manning and Soon, 2014). Whilst some of these transactional tools are  
145 private mechanisms, legislative standards in the European Union (EU) also underpin the  
146 use of the term ‘organic’ or provenance designated geographic origin (EU Protected Food  
147 Name Scheme via the requirements of Regulation EU No 1151/2012).

148         This review paper considers specifically food fraud in the fresh produce supply  
149 chain and the existing and emerging product and process verification activities that take  
150 place. The British Retail Consortium (BRC, 2018) Global Food Standard describes  
151 verification as the application of methods, procedures, tests and other evaluations, in  
152 addition to monitoring, to determine whether a control or measure is or has been operating

153 as intended. Process verification is the assessment of objective evidence that relates to  
154 process integrity such as the assessment of documentation, product and process  
155 certification and traceability data rather than product testing. However, process  
156 verification, such as third party certification (TPC) relies upon the ability to assess valid,  
157 authentic, objective and representative evidence (Manning and Soon, 2014). Product  
158 verification involves the analysis and testing technologies used both within a quality  
159 assurance programme and by regulators when investigating potential instances of  
160 fraudulent behaviour.

## 161 **2. Process verification: the role of auditing**

162 An audit is the systematic, independent and documented process undertaken to obtain  
163 and then evaluate valid, representative, objective evidence (records, statements of fact or  
164 other information) to determine whether the evidence demonstrates that audit criteria  
165 (policies, procedures and requirements) and standards have been fulfilled (BS EN ISO  
166 9001: 2015). Therefore, auditing is an effective form of verification when it identifies  
167 both conformity and any deviations from standards, legislation or regulation whilst  
168 trading this outcome against using the minimum amount of resources to achieve the audit  
169 objectives (Kleboth et al, 2016). In a transactional way, the industry often sees audits as  
170 being of value when they are quick yet accurate, sometimes referred to as a snapshot,  
171 independent, objective, unbiased, transparent, reliable, scalable and as a result promote  
172 consensus building (Albersmeier et al. 2009; Salama et al. 2009; Powell et al. 2013).  
173 However, TPC audits, a key element of process verification activities in the supply chain,  
174 are a market interaction and there is a risk that this economic framing could impact on  
175 independence and validity (Martinez et al. 2013; Verbruggen and Havinga, 2015). The  
176 Elliott Review (2013) noted that the quality and completeness of TPC audits was variable  
177 and that there is a danger that an audit regime can be used for raising revenue, placing

178 unnecessary costs on food businesses. TPC audits alone will not deliver effective  
179 verification of integrity in the food supply chain and they need to be undertaken in co-  
180 ordination with other activities such as product testing.

181       One challenge to the efficacy of TPC and even first party or second party audits as a  
182 form of verification is the degree of data integrity. Data integrity, quite simply, is the  
183 quality of data i.e. the degree of accuracy, consistency or validity of data held by an  
184 organisation or multiple organisations in the food supply chain. This data is either hard  
185 form (paper based) or digital form contained on computers, networks and clouds. Whilst  
186 the increased ability to store information might improve timeliness for process and  
187 product verification, conversely the volume of data being held can lead to data swamping  
188 for supply chain organisations, regulators and certification bodies undertaking third party  
189 verification (Manning et al. 2017; Manning and Wareing, 2018). Data swamping arises  
190 as a result of the sheer volume of data being collected and stored, the inefficient control  
191 or storage of data either as a result of strategic weakness or because of the cost of  
192 implementing digital solutions, or simply a misunderstanding of the timeline for data to  
193 be collected and then shared with others. There is no current literature on the challenge  
194 of data swamping or indeed the effective management of data in the food literature  
195 suggesting this is an area for future empirical research. In this context, data management  
196 can be considered as the actions taken, and governance implemented, to ensure data  
197 integrity when an organisation acquires, validates, stores and shares data.

198       One technological solution put forward to address data integrity and data management  
199 is the use of distributed ledger technology, with one option being Blockchain. The  
200 proposed advantages of this type of technology are reduced cost and increased speed of  
201 transactions in the supply chain, more effective incident identification and  
202 responsiveness, and the ability to overcome information asymmetry especially for



203 consumers and as a result improving inter-actor trust and transparency (Manning and  
204 Wareing, 2018). The disadvantages are the need for strong governance of systems to  
205 prevent cyber-security breaches. The nature and type of cyber threats is increasing and  
206 shifting rapidly in line with the use of digital data technology and the risk of infiltration  
207 of digital networks (Khursheed et al. 2016).

208 Hollands et al. (2018) consider the benefits and challenges associated with  
209 Blockchain and argue that traceability systems are already a core strategic process within  
210 many food company management systems that control products and manage supply chain  
211 data especially through enterprise resource planning (ERP) platforms. However they  
212 counter ERP systems are expensive to implement and Blockchain technology may  
213 provide the opportunity to link “blocks of information” associated with distinct  
214 transactions that can form a tracking and tracing system. The IBM platform “Food Trust”  
215 has been used to trace mangoes to source in seconds superseding the one step forward  
216 one step back systems mentioned earlier in this paper. However Bateman and Cottrill  
217 (2017) suggest that there are challenges to the use of Blockchains, distributed ledgers,  
218 especially if the data is of poor quality that is entered into the system especially where  
219 the data then becomes immutable. They further argue that not all members of the supply  
220 chain have digital access especially smallholders in developing countries so this can mean  
221 that some data is still recorded manually before later being entered into a system. There  
222 is still a risk too of fraudulent behaviour where incorrect data is intentionally entered into  
223 the system. Thus, data integrity and associated management and security protocols need  
224 to be more actively developed and verified in fresh produce supply chains to reduce the  
225 potential for both intentional and unintentional mislabelling incidents.

### 226 3. **Product verification: testing technologies**

227 An alternative approach to audits for establishing product attributes is to test the  
228 produce for its innate integrity. When determining an appropriate testing technology the  
229 first consideration is whether the technology is using a targeted or a non-targeted method.  
230 Targeted methods are seeking to identify the presence or alternatively absence of specific  
231 markers that can demonstrate i.e. authenticate the identity of a given food or identify the  
232 presence of a given chemical or contaminant. Non-targeted methods are used as a wider  
233 screening mechanism for food. Ballin and Laursen (2018) in a review of analytical  
234 approaches for food authentication have proposed definitions and nomenclature for  
235 targeted and non-targeted approaches. Targeted analysis focusses on one or more pre-  
236 defined analytical target(s) e.g. a specific pesticide residue. Non-targeted analysis,  
237 simultaneously detects numerous unspecified targets or data points (often>100) and is  
238 often qualitative e.g. ‘fingerprinting’ or metabolomics (Ballin and Laursen, 2018).  
239 Difficulties in developing authenticity methodology include finding appropriate markers  
240 that characterise an element of the food that is consistent and can be measured accurately  
241 and having authentic samples that can assist methodology development in the first place  
242 (Primrose et al. 2010). Chemical methods to determine authenticity include primary  
243 metabolites such as sugar, amino acid and/or organic acid profiles of certain fruits (Bat et  
244 al. 2018). However, they argue secondary metabolites are influenced by geographic origin  
245 and production methods. Proving fraud has taken place requires detailed detection  
246 techniques (Woolfe and Primrose. 2004) and studies deploying DNA markers to identify  
247 mislabelling of plant-derived products are limited (Scarano et al. 2015). Fresh produce  
248 can be characterised using ‘classical techniques’ such as the use of isotope ratio mass  
249 spectrometry. Increasingly, new technologies are superseding and complementing these  
250 techniques. The majority of these constitute the so-called ‘omic’ technologies where high  
251 throughput analyses are combined with chemometrics and bioinformatics

252           The key authentication issue in fresh produce, as previously described, is that of  
253 origin i.e. is the correct variety named; is the geographic origin of the crop correctly  
254 identified; have unapproved/illegal pesticides been applied; is the crop ‘wild harvested’;  
255 is the crop ‘organic’; (Esslinger et al. 2014). Different approaches are considered here  
256 that address these issues and provide data where authenticity, identity or provenance and  
257 regulatory compliance can be determined.

### 258 ***3.1 Variety testing***

259           DNA analysis techniques have developed to identify species or variety include  
260 detection of single nucleotide polymorphisms (SNPs), simple sequence length  
261 polymorphisms (SSLPs), restriction fragment length polymorphisms (RFLPs), and the  
262 use of real-time polymerase chain reaction (PCR) and heteroduplex analysis (Woolfe and  
263 Primrose, 2004; Primrose et al. 2010). Identification techniques based on PCR  
264 amplification followed by simple sequence repeats (SSR) analysis and principal  
265 coordinate analysis (PCA) can identify genetic differences in varieties of tomatoes  
266 especially in processed products where morphological markers may be lost (Scarano et  
267 al. 2015). SSR techniques have also been used for variety identification, genetic  
268 fingerprinting, genetic diversity analysis and parentage verification in *Prunus* species, but  
269 specifically sweet cherry (Liu et al. 2018). However, the level of DNA may not reflect  
270 accurately the amount of material originally substituted or added especially if processing  
271 has degraded the DNA or there are multiple copies of a given gene sequence in a cell  
272 (Primrose et al. 2010).

273

### 274 ***3.2 Geographic origin***

275           Consumers are willing to pay a premium for local food (Feldmann and Hamm,

276 2015), but the geographic origin of produce can be difficult to quantify. Isotope  
277 abundances can vary with the geographic location, and if samples of the soil or water are  
278 available from geographical regions, it may be possible to identify material grown in that  
279 area. For example, it was possible to discriminate between peppers of different  
280 geographical origin by correlating the  $\delta^{18}\text{O}$  of water in the peppers with a database of  
281 isotope ratios for water (Flores et al. 2013). Another approach is to use elemental  
282 fingerprinting (Danezis et al. 2016) where the profile of groups of macro elements, trace  
283 elements, rare earth elements and ultra-trace elements can be used as an indicator of  
284 geographical origin as the profiles are linked to the geology of the production area  
285 (Danezis et al., 2016). Perini et al. (2018) conclude from their studies on soft fruit that  
286 the  $\delta^{13}\text{C}$  and  $\delta^{15}\text{N}$  value of pulp and the  $\delta^{18}\text{O}$  of juice can be used to differentiate  
287 geographical origin and verify declared provenance. In addition, microbial populations  
288 may differ between geographical locations and El Sheika et al. (2009) analysed the yeast  
289 community structures on the surface of *Physalis* and successfully discriminated between  
290 geographical production areas.

### 291 ***3.3 Misrepresented use of pesticides***

292 Fresh produce monitoring programmes by retailers and enforcement agencies  
293 target residue testing towards levels of specific compounds either the active ingredient or  
294 the associated breakdown products. Multi-residue analysis methods commonly use gas  
295 or liquid chromatography coupled with mass spectrometry (GC/LC-MS) (Stachniuk,  
296 2018). Residue testing has two uses: it can establish whether label recommendations have  
297 been followed i.e. Good Agricultural Practice (GAP); and whether residues are present  
298 of non-approved or illegal pesticides. However, the approach has limitations as residues  
299 decline over time and early application of non-approved compounds may mean residues  
300 are undetected at reportable levels.

301 ***3.4 Misrepresented use of synthetic fertiliser***

302 It is possible to detect the accumulation of synthetic N fertiliser in plant tissues by  
303 looking at stable isotope ratios in the produce in a targeted approach. Crops grown  
304 organically have  $\delta^{15}\text{N}$  values of +0.3 to +14.6%, while crops grown with synthetic N  
305 fertiliser range from negative to positive values, i.e. -4.0 to +8.7% (Inácio et al. 2015).  
306 However, a number of studies have highlighted the weaknesses in this approach where  
307 the organic and conventional values can overlap e.g. Schmidt et al. (2005) reported that  
308 lettuce, onions, cabbage and Chinese cabbage from field production had  $\delta^{15}\text{N}$ -values in  
309 the range of +5 to +6 for conventional production and +5.5 to +7.5 ‰ for organic  
310 production. In addition, the application of a small amount of manure or the use of water  
311 with a large concentration of nitrate can result in an increase of the  $\delta^{15}\text{N}$  values, close to  
312 those obtained in organic production (Laursen et al. 2014). On its own,  $\delta^{15}\text{N}$  data can only  
313 provide supporting evidence in suspected fraud cases, but not for discriminating between  
314 both production systems (Bueno et al. 2018).

315 ***3.5 Substitution of conventionally grown produce as organic.***

316 Studies have suggested using multiple isotopes of nitrate derived N and O  
317 (Laursen et al. 2013; Mihailova et al. 2014). Approaches based on the measurement of  
318 multiple biomarkers and/or complex chemical or physical profiles/fingerprints supported  
319 by multivariate statistical analysis show more potential (Capuano et al. 2013). Bueno et  
320 al. (2018) demonstrated that a combined chemo-metric analysis of high-resolution  
321 accurate mass spectrometry (HRAMS) and  $\delta^{15}\text{N}$  data was able to discriminate  
322 successfully between organic and conventionally grown tomatoes. Multivariate analysis,  
323 combining isotope data with mineral content (Yuan et al. 2018), and mineral content and  
324 key metabolites (Flores et al. 2013) have been able to classify organic and conventional  
325 brassica, peppers and lettuce.

326 Studies have found that organic methods of vegetable production have increased  
327 concentration of total glucosinolates and benzylglucosinolate which can be used to  
328 differentiate methods of cultivation (Rossetto et al. 2013); and major and trace element  
329 profiling has been used to determine whether onions and peas were conventionally or  
330 organically grown (Gundersen et al. 2000). Bioactive components such as phenolic and  
331 hydrophilic antioxidant capacity were identified as markers for being able to determine  
332 organic and conventional tomato juices (Vallverdú-Queralt et al. 2012).

333 Trace element and nitrogen isotope data is of value in differentiating conventional  
334 and organic tomatoes but less effective with lettuce indicating a concern over analytical  
335 testing being used in isolation as a single determinant of provenance (Kelly and Bateman,  
336 2010). Picchi et al. (2012) urged caution that phytochemical content as a marker for  
337 considering a crop's response to growing methods, in this case cauliflower, was affected  
338 by genotype i.e. some genotypes showed improved phytochemical content under organic  
339 production and others particularly with regard to glucosinolates and ascorbic acid did not.

340 Conventional and organic production influence the external microbial populations  
341 and internal metabolite production. There is a significant focus on the use of  
342 metabolomics (metabolite fingerprinting) to discriminate between production systems  
343 using both targeted and non-targeted approaches (Cubero-Leon, 2014; Medina et al.  
344 2019). Bigot et al. 2015 analysed the yeast and bacterial community profiles on the  
345 surface of nectarines and peaches using PCR-DGGE to differ between organic and  
346 conventionally produced crops. Llano et al. (2018) demonstrated that an untargeted  
347 metabolomics approach was able to identify metabolites (biomarkers) that could  
348 discriminate between organic and conventional goldenberry fruit.

#### 349 **4. Conclusion**

350 One of the challenges of additional supply chain risk assessment processes and  
351 verification steps is that this can add quality cost to the supply chain but it is a preventative  
352 cost that will offset the costs of a recall. Risk assessment processes for food fraud include  
353 the use of threat analysis critical control point (TACCP) and vulnerability analysis critical  
354 control point (VACCP). However, only known and assessable threats can be prioritised  
355 (using a semi-quantitative assessment of likelihood and severity) to then develop a control  
356 measure(s) (countermeasure) and then a subjective scoring system to identify CCPs. Then  
357 effective fraud risk management, monitoring and verification systems can be developed.  
358 However the binary aspect of known/unknown threats means that decision-makers may  
359 then identify a subsequent incident that could lead to a major food recall as simply being  
360 “unforeseeable” (Manning, in press).

361 Since the Elliott Review, the notion of food integrity has been developing not just in  
362 terms of the product itself, but also the processes employed, the behaviour of individuals  
363 and the validity of data that is being used (Manning, 2016). This growing interest in  
364 integrity has led to the emergence of new techniques to confirm origin, variety and  
365 method of production e.g. organic or conventional. Indeed, metabolomics is enabling  
366 metabolite fingerprinting which is showing the potential to discriminate between a range  
367 of production factors. Further studies will require large numbers of samples to be taken,  
368 analysed and the results included in reference databases. These will need to encompass  
369 a wide range of sources of variation for the target biomarkers i.e. different agronomic  
370 conditions, vegetable varieties and geographical locations (Bueno et al. 2018). Non-  
371 targeted metabolomics utilized in metabolite fingerprinting can generate very large  
372 datasets, requiring bioinformatics analysis and increasingly machine learning (Medina et  
373 al. 2019). These developments are of value in determining the potential for mislabelling  
374 and mis-description, and effective verification protocols combining product and process

375 verification need to be developed and effectively implemented in order to maintain  
376 consumer trust in the fresh produce industry.

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682 **Table 1. Factors that influence fresh produce supply chains (Adapted from**  
683 **Ahumada and Villabos, 2009; Shukla and Jharkharia, 2013).**

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<b>Strategic</b>	<b>Tactical</b>	<b>Operational</b>
Financial planning	Harvest planning	Production scheduling activities
Demand forecasting accuracy and modelling	Crop choice	Harvesting
Capacity (warehouse and production facilities)	Crop scheduling	Storage
Supply network design Technology	Logistics and transportation	Transportation (vehicle routing)
Demand-price elasticity	Inventory management	Weather conditions
	Labour selection	Plant maturation rates
		Product shelf-life/rate of deterioration

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687 **Table 2. Examples of fresh produce mislabelling and misrepresentation**

Case	Details
Case 1	Vidalia spring onions (Georgia United States) have a premium price compared to product from other US states. 1986 saw state legislation to delignate a specific production area. Additional quality control systems were put in place. Incidences of rebagging occurred. Between 2001 and 2003 there were six fines ranging from \$5,000 to \$29,000 for misuse of Vidalia label. A further case fine was \$100,000. (Carter et al. 2006)
Case 2	The “San Marzano” tomato is one of the most important processing tomato varieties in the world. The tomato has a designated origin but is often substituted with other plum tomatoes from both Italy and outside Italy leading to deception of consumers (Scarano et al. 2015).
Case 3	The labelling of Greek produce as Cypriot when there was oversupply of Greek product due to the Russian embargo in 2014 (Joyce, 2014)
Case 4	A Canadian company AMCO Produce was fined \$210,000 in 2018 by the Canadian Food Insepction Agency (CFIA) because between 2012 and 2014, the company was said to have intentionally mislabelled produce, including tomatoes and cucumbers, as being from Canada when the country of origin was in fact Mexico. The products were sold to Sobeys Inc. and other retailers. The CFIA undertook a random inspection and found products labelled as Ontario produce when in February the temperatures were too low in the region for greenhouse production (Karst, 2018).
Case 5	Australian Supermarkets Coles and Woolworths were fined in 2011 when two stores were identified as selling mislabelled fruit – one for not declaring the country of origin and the other store for selling lemons origination from the USA as “Product of Australia” (Eckersley, 2011).

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