

BTSF

Priorization of risks — Dennis RASCHKE

Contract number 2017 96 05 – New Food Investigation Techniques –
Phase II - *Course 2b: E-Commerce of food advanced*

© European Union 2020

Unless otherwise noted the reuse of this presentation is not authorised. For any use or reproduction of elements that are owned by the EU, permission may need to be sought directly from the respective right holders. All statements and references in this presentation come from the Training coordinator and tutors and do not represent the official position of the European Commission.

BTSF G@ZIELT - online search types

search type	legal basis	search by	trigger	risk-based	scope	degree of automatization
eFBOs	§3(2) a) VwV ¹ §38a LFGB ²	BZSt ³	BZSt ³ : continuous search → ~3-4 data deliveries to G@ZIELT/year	N	all DE eFBOS	BZSt ³ : automated → Xpider G@ZIELT: → macro-based distr. → upload to FIS-VL
product	§3(2) b-d) VwV ¹	G@ZIELT	RASFF/RAPEX etc. Länder request	Y	offers for DE consumers (specific products)	mainly manual → macro-based distr. → upload to FIS-VL
annual plan	§5 VwV ¹	G@ZIELT	coordinated programmes (DE)	Y	search for DE vendors (product categories)	manual & automated → automatization with prototype of HAW ⁴

¹ **VwV**: Administrative agreement for the establishment of G@ZIELT; ² **LFGB**: German food and feed law

³ **BZSt**: Federal Central Tax Office; ⁴ **HAW**: University of applied sciences (Hamburg)

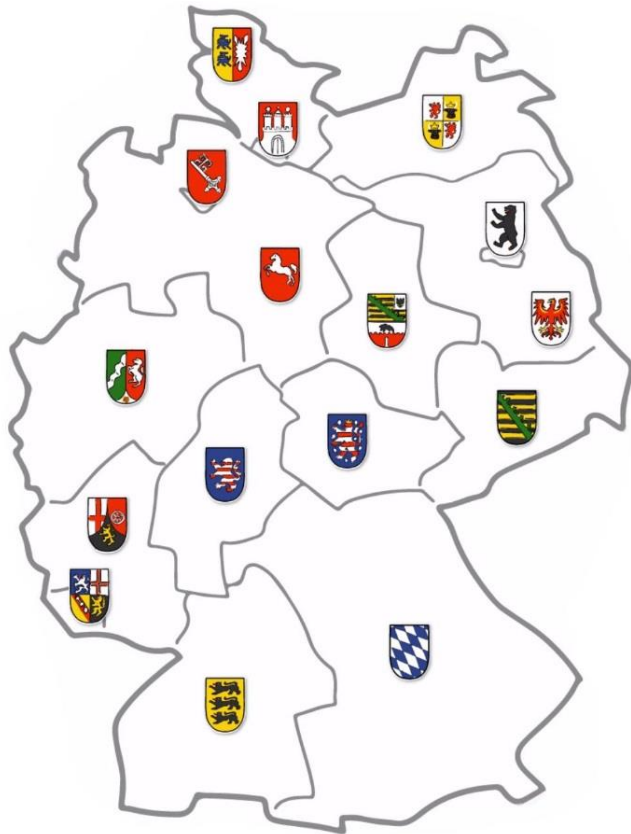
BTSF Coordinated online-control programme: “Annual plan”

Prioritization process

BTSF

BTSF G@ZIELT - online search types

Coordinated control programmes “Annual Plan”



BTSF G@ZIELT - online search types

Coordinated control programmes “Annual Plan”



Annual plan

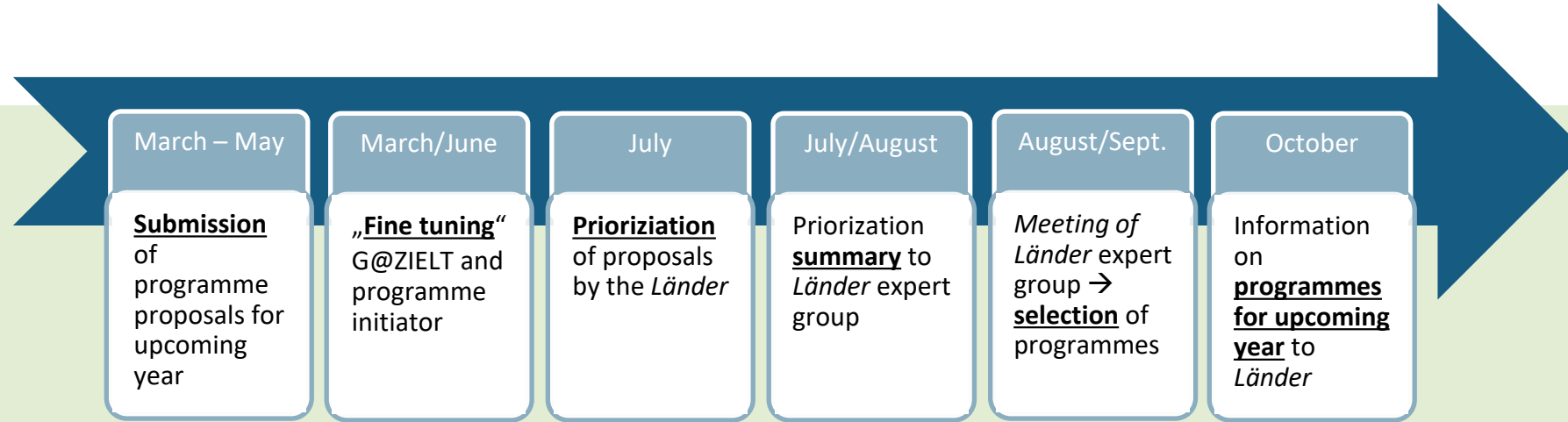
- Since 2014
- 25 programmes
- >5000 vendors
- Many not known to CA
- Several test purchases

risk-
orientated
programmes

identification
of potential
problems

established
submission
procedure

BTSF Annual plan - program submission procedure



BTSF G@ZIELT - online search types

Coordinated control programmes “Annual Plan”



Honey

- Online status-quo
- incl. special honeys (e.g. manuka)
- Quality, misleading/fraudulent offers, origin, claims

> 600 honey vendors

> 200 manuka vendors

> 150 market place vendors

BTSF Product search”

Prioritization process

BTSF

BTSF Product search - statistics

Product category	Number of searches/year	Identified offers/year
Food	~110	~600
Consumer products	~140	~300
Cosmetic products	~80	~600
Tobacco products	~10	~50
Feed	conducted in annual plan	
Total	~340	~1550

BTSF G@ZIELT - Product search

Sources for internet searches



RASFF

RAPEX

AAC

INFOSAN

RAS

Local CA

MS/TC
authority

Consumer
complaint

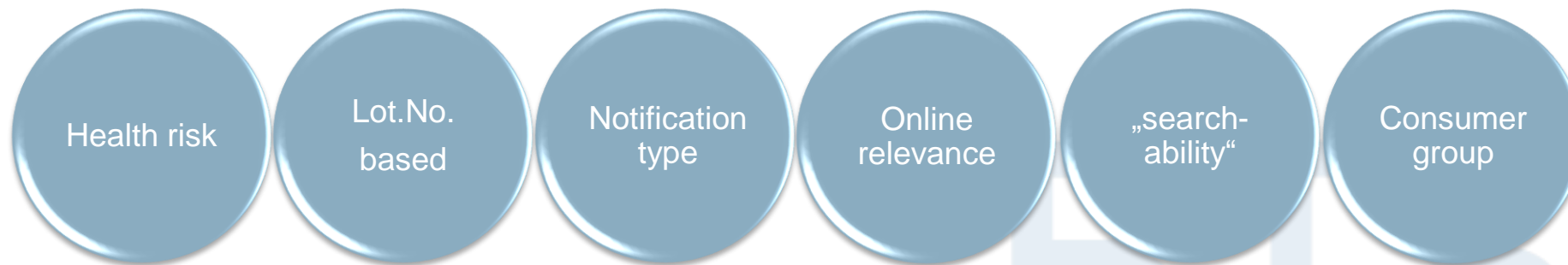
NGO

Public
warning

BTSF G@ZIELT - Product search

Criteria for prioritization of internet searches

Example RASFF



ONLY indicators – ALWAYS case-by-case decision

BTSF G@ZIELT - Product search

Criteria for prioritization of internet searches

Example RASFF



Hazard

Category

Risk decision

- serious
- not serious
- undecided

BTSF G@ZIELT - Product search

Criteria for prioritization of internet searches

Example RASFF

Lot.No.
based

- Does the objection (most likely) also apply for other lots?
 - **sildenafil, sibutramine** in food supplements
 - (most likely) yes
 - **microbial contamination**
 - (most likely) not
 - **labelling of allergens**
 - maybe

BTSF G@ZIELT - Product search

Criteria for prioritization of internet searches

Example RASFF

Notification
type

Type

Type

Classification

Basis

Hazard

withdrawn

alert
border rejection
information
information for attention
information for follow-up
news
rejected

BTSF G@ZIELT - Product search

Criteria for prioritization of internet searches

Example RASFF

- Notification type NOT always indicator
 - Alert
 - can have low priority (e.g. Lot.-based)
 - Information for attention
 - can have high priority
 - e.g. no stationary FBO/CA identified
 - Border rejection
 - can have high priority
 - Internet provides other “entering points”



BTSF G@ZIELT - Product search

Criteria for prioritization of internet searches

Example RASFF



- Not all notified products can be found online
 - More frequent for RAPEX than RASFF
 - Imprecise descriptions
 - Lack of identifiers (e.g. GTIN)
 - feed/food B2B
 - “red t-shirt”
 - “leather gloves”

BTSF

BTSF G@ZIELT - Product search

Criteria for prioritization of internet searches

Example RASFF



Consumer
group

- YOPIs
 - Young, Old, Pregnant, Immunosuppressed
- Could be high priority, even if other indicators do not apply
 - e.g. baby, senior, convalescence food
 - e.g. microbial contamination, choking hazard (crushing degree of puree)

BTSF G@ZIELT - Product search

Prioritization challenges

- **Challenge allergen notifications**
 - „only“ labelling BUT serious health risk for some consumers
 - no general rule – always case-by case!
- **Labelling only missing in one language**
- **Allergen is main component of the product („peanut bar“)**



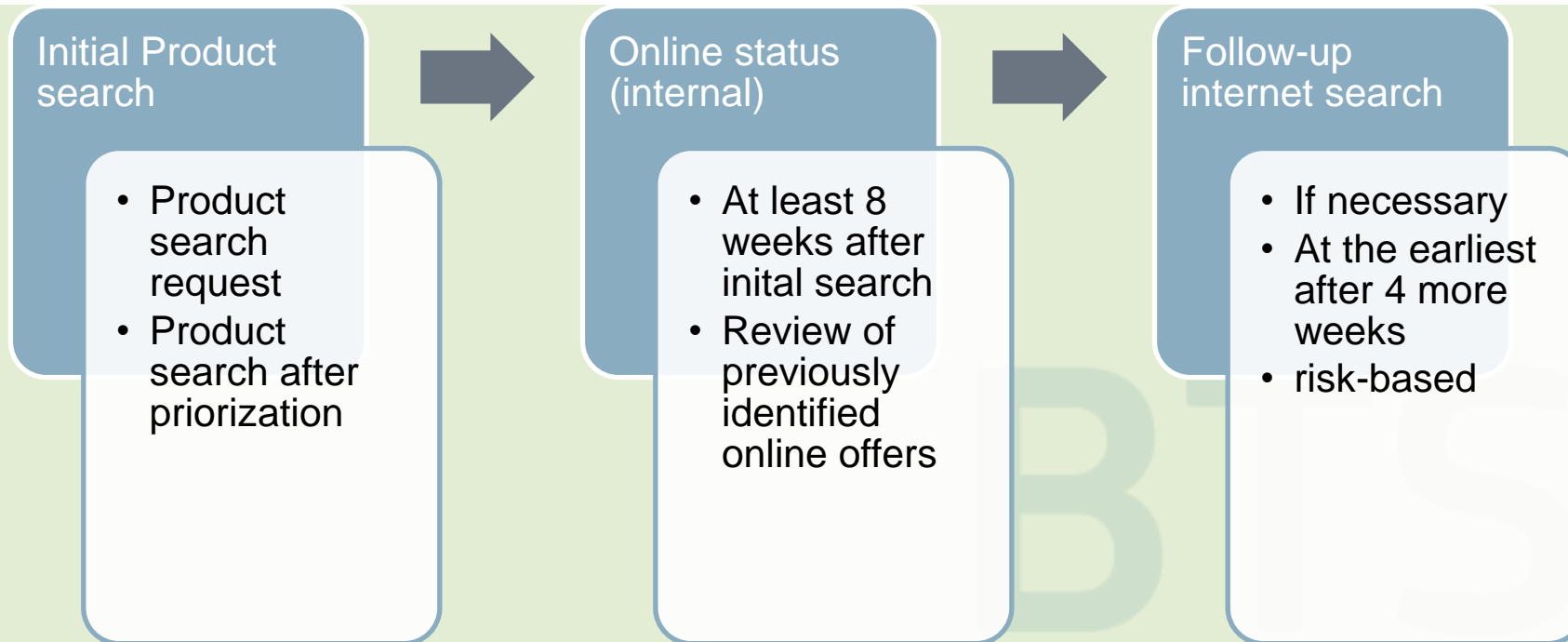
BTSF G@ZIELT - Product search

Prioritization challenges

- **Case: RASFF - Food supplement**
- **Preliminary online search revealed**
 - Only in certified online pharmacies
 - Probably not in stock
 - challenge for CAs
 - Product recall will work
 - NO online search?
- BUT
 - one stationary pharmacist owned several different online shops
 - Relevant for CA
 - online search performed!

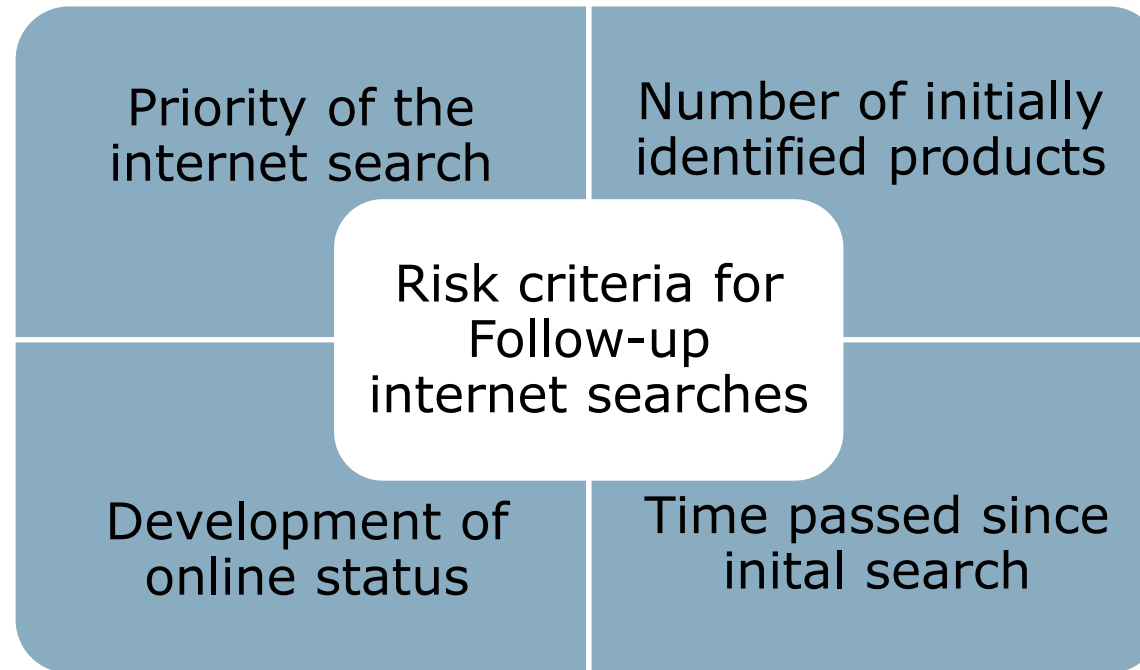


BTSF Product search procedure



BTSF Product search

Criteria for Follow-up internet searches



BTSF

Thank you

European Commission
Consumers, Health and Food Executive Agency
DRB A3/042
L-2920 Luxembourg

AENOR INTERNACIONAL
6, Genova street. 28004. Madrid, SPAIN
Tel: +34 91 432 61 25
Mail: 20179605NFIT@aenor.com
www.btsf-aenor.com

AENOR

© European Union 2020

Unless otherwise noted the reuse of this presentation is not authorised. For any use or reproduction of elements that are owned by the EU, permission may need to be sought directly from the respective right holders. All statements and references in this presentation come from of the Training coordinator and tutors and do not represent the official position of the European Commission.

Slide xx: [element concerned](#), source: [e.g. Fotolia.com](#); Slide xx: [element concerned](#), source: [e.g. iStock.com](#)