



Prevention of Food Fraud

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DEFINITION

Food fraud is defined as the deliberate substitution, addition, tampering, or misrepresentation of food, ingredients, or packaging for economic gain. The purpose of this program is to **minimize the risk of purchasing fraudulent or adulterated raw materials** and to ensure that all product descriptions, specifications, and claims are legal, accurate, and verified. This program also supports compliance with **FDA Food Safety Modernization Act (FSMA) Preventive Controls (21 CFR Part 117)**, **USDA FSIS labeling requirements (9 CFR Parts 317 & 381)**, and applicable **SQF/ISO standards** regarding authenticity and traceability.

APPLICATION

This procedure applies to all members of the **Food Security Team**. The program includes supplier verification, raw material evaluation, vulnerability assessments, and corrective actions for suspected fraudulent or adulterated food ingredients.

OPERATING PROCEDURES

- **Raw Material Identification**

- The team will determine the list of raw material ingredients, or groups of raw material ingredients, that require evaluation for fraud vulnerability.
- Ingredients historically associated with adulteration (e.g., spices, oils, honey, seafood) will be prioritized.

- **Research and Risk Identification**

- Potential adulteration or substitution risks will be identified using credible regulatory and industry sources, including FDA, USDA, and industry trade databases.



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- **Vulnerability Assessment**

- Each raw material or group of materials will undergo a documented vulnerability assessment using the Food Fraud Vulnerability Assessment Form.
- Evaluation factors include: historical evidence of fraud, economic drivers, ease of adulteration, and testing availability.

- **Review and Corrective Actions**

- Materials identified as high-risk will require additional controls, including supplier testing, verification through accredited labs, or product holds until authenticity is confirmed.

- **Supplier Verification**

- As part of the **Approved Supplier Program**, suppliers must provide valid annual certifications and regulatory compliance documents.

- **Label Review and Claims Verification**

- Claims such as organic, halal, kosher, non-GMO, and identity-preserved status must be substantiated by proper documentation.

- **Personnel Oversight**

- Staff handling raw materials must be trained to verify that product labeling and specifications meet authenticity and compliance requirements.

- **Additional Control Measures**

- Where risks remain, additional measures such as restricted access, supplier audits, and enhanced monitoring will be implemented.



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TRAINING FREQUENCY

- Training on food fraud prevention will be conducted **upon hire** and **annually thereafter**.
- Documentation will be maintained with employee sign-off sheets.

EFFECTIVENESS & VERIFICATION

- Annual review of vulnerability assessments
- Internal audits of supplier verification records
- Randomized QA testing
- Corrective action follow-up for fraud incidents

FORMS/RECORDS REQUIRED

- Food Fraud Vulnerability Assessment Form
- Supplier Approval & Certification Records (SOP-102)
- QA Hold/Release Log (SOP-120)
- Training Sign-off Sheets
- Annual Review Documentation



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CHANGE FROM PREVIOUS VERSION

Revision #01: First issue of Food Fraud Prevention SOP.

Training Required: Yes.

REFERENCES

U.S. Federal Regulations

- 21 CFR Part 117 – Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food (FDA)
- 21 CFR Part 1, Subpart L – Foreign Supplier Verification Programs (FSVP)
- 9 CFR Part 317 – Labeling, Marking Devices, and Containers (USDA FSIS – Meat)
- 9 CFR Part 381 Subpart N – Labeling and Containers (USDA FSIS – Poultry)
- 7 CFR Part 205 – National Organic Program (USDA)

FDA Guidance

- FDA Food Defense Tools and Resources: <https://www.fda.gov/fooddefense>
- FDA Food Fraud Mitigation guidance under FSMA Preventive Controls



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USDA Guidance

- USDA FSIS Labeling Policy Book
- USDA Fraud Prevention resources for meat, poultry, and processed egg products

Industry & Academic References

- U.S. Pharmacopeia (USP) Food Fraud Database: <https://www.foodfraud.org>
- Michigan State University Food Fraud Initiative: <http://foodfraud.msu.edu/>
- National Center for Food Protection and Defense (NCFPD), University of Minnesota
- American Spice Trade Association (ASTA) Food Integrity Resources
- Flavor and Extract Manufacturers Association (FEMA) Safety & Fraud Guidance

Standards

- SQF Code, Edition 9 – Food Fraud & Food Defense Requirements
- ISO 22000:2018 – Food Safety Management Systems
- ISO/TS 22002-1:2009 – Prerequisite Programs on Food Safety