

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.

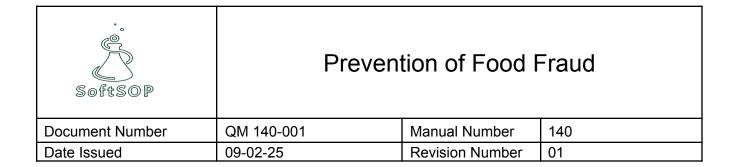
OPERATING PROCEDURES

• 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.



• 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.



Prevention of Food Fraud

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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.

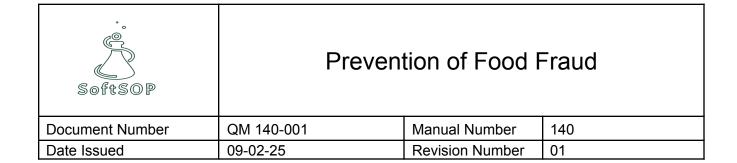
REFERENCES

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



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