**Company Name Document Reference:**

**Program Document**

**Document Type: Food Fraud Page: 1 of 2**

**Purpose**

Establish a food fraud program to prevent intentional deception for economic gain due to potential product substitution, mislabeling, dilution, counterfeiting, or stolen goods which may adversely impact food safety

The food fraud program should include a policy statement and the following:

* A food fraud vulnerability assessment - details (name of company) susceptibility to product substitution, mislabeling, dilution and counterfeiting which may adversely impact food safety;
* A food fraud mitigation plan – specifies the methods/steps by which the identified food fraud vulnerabilities shall be controlled.

The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually. Records of reviews of the food fraud vulnerability assessment and mitigation plan are maintained.

**Examples of food fraud cases:**

* Counterfeiting - substitution of ingredients and products with similar packaging or the mixing of inferior quality ingredients to increase the volume of products ...
* Adulteration - adding ingredients like sugar or sweeteners to honey or maple syrup in order to produce a similar taste while adding volume or, in the case of baby formula, ...
* Dilution - olive oil mixed with other types of oil, wine with grape blends, and fruit juices diluted in water then mixed with other ingredients to produce a similar taste ...

Reference: Food Fraud Policy Example (see pg.2)

Food Fraud Vulnerability Assessment w/example

Food Fraud Mitigation Plan

**Example of Food Fraud Policy Statement**

Policy: Food Fraud (Template)

Supply Chain shall have a formal Food Fraud Vulnerability Program. The program shall address the requirements below and describe what steps to secure ingredients and finished product to deter deliberate and intentional food fraud including, substitution, concealment, mislabeling, grey market production, unapproved enhancements and counterfeiting for economic reasons. The Food Vulnerability Program plan shall be derived from a formal vulnerability assessment. The objective of the assessment is to create awareness and identify areas where control measures may be needed to either eliminate or control the identified food fraud risk.

Key Elements:

* Food Fraud Vulnerability assessments shall be made and documented to identify potential food fraud vulnerability and risks using a vulnerability assessment tool.
  + The Food fraud vulnerability assessment shall take into consideration three key elements.
    - Opportunity related fraud risk factors
    - Supplier History
    - Motivation related fraud risk factors
    - Fraud control measures
* A vulnerability control plan will identify mitigation steps to manage the potential for food fraud.
* The food fraud vulnerability program shall be reviewed annually, or anytime there is a significant breach or public incident that warrants review.

**END**