

Food Fraud Risk Management

Managing the Risk of Food Fraud throughout your Interactions within the Food Sector

Development

To define detail, scope and purpose.

Development

This information can be used to develop food safety and quality programs that meet the requirements of modern Regulatory, Customer and Industry Standards:

- We take the time to explain the expectations and requirements of food safety and quality compliance as these relate to your food safety and quality programs.
- You may choose to use our Premium Resources to build, enhance or upgrade your food safety and quality program.
- We encourage you to share this webpage with any food compliance associates and peers you believe may benefit from our commitment to providing our users with user-friendly information and resources to achieve a superior Food Fraud Risk Management program.
- We welcome your suggestions for additions of general or specific content through the haccp.com Contact Page.

Key Definitions for Food Fraud Risk Management

- **Black Market Items:** Food products that are sold, traded or diverted outside legitimate and authorised supply channels, such as stolen, smuggled or unregistered goods.
- **Counterfeiting:** The copying or imitation of a food product, its packaging or its labelling in order to pass it off as a genuine branded product.
- **Critical Control Point or CCP:** A Critical Control Point is a point, step or procedure at which controls can be applied and a food safety hazard can be prevented, eliminated or reduced to acceptable levels. In the context of VACCP, a CCP may also be referred to as a VCP or Vulnerability Control Point.
- **Critical Limit:** A critical limit is a criterion or boundary that is used to distinguish between what is acceptable or safe, and what is unacceptable or unsafe. A critical limit is a measurable value of a parameter or variable.
- **Dilution:** The mixing of a valuable liquid ingredient with a cheaper liquid, such as the addition of water to juice or oil, to increase volume.
- **Economically Motivated Adulteration or EMA:** Economically Motivated Adulteration is a Food Fraud Risk generally facilitated from within the food sector itself, with the intent of increasing profits or lowering production cost.
- **Food Fraud:** Defined by the deliberate and intentional adulteration or modification of food, its ingredients or packaging, product information, labelling, or misleading statements made about a food product for economic gain that could also negatively affect consumer health.
- **Food Fraud Risk Management:** Food Fraud Risk Management covers the methodologies applied to identify risk to food from acts of unsafe modifications or intentional adulteration.
- **HACCP:** Hazard Analysis Critical Control Point or HACCP as it is commonly known, is a science-based risk management system, relying on identification and recognition of specific hazards, and nominates measures for their control to ensure the safety of food.
- **Mislabelling:** The labelling of a food product with false or misleading information about its identity, origin, composition, grade or production method.
- **Prerequisite Programs:** Documented foundation programs, such as supplier approval, procurement, hygiene, maintenance and traceability controls, that provide the conditions needed for a VACCP plan to operate effectively.
- **Substitution:** The replacement of a genuine ingredient or product with a cheaper or lower-quality one without disclosure.
- **VACCP:** Vulnerability Assessment and Critical Control Point or VACCP is the application of risk assessment

methodologies for the identification of risk and control measures to prevent food fraud. This system helps identify the vulnerability of various points in the supply chain, particularly due to the possible threat of economically motivated adulteration.

- Vulnerability: A status or scenario that can lead to a food fraud incident, such as weak supplier controls, high ingredient prices or limited testing.
- Vulnerability Control Point or VCP: A point, step or procedure at which a control can be applied to prevent, eliminate or reduce a significant food fraud vulnerability.

Food Fraud Risk Management Development

When considering the development, documentation and implementation of Food Fraud Risk Management within food safety and quality management systems, the following information should be considered to ensure effective outcomes:

About Food Fraud Risk Management

Food Fraud Risk Management is by no means a new concept. It has been applied in many different incarnations over time. The term 'Food Fraud Risk Management' is used to describe the various methodologies implemented to ensure the food provided to consumers is wholesome, genuine and not unnecessarily tampered with.

Major certification schemes recognised by the Global Food Safety Initiative expect certified food businesses to document a food fraud vulnerability assessment and a mitigation plan.

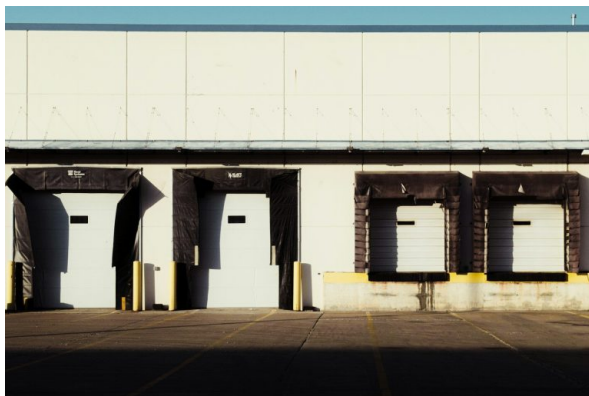
Food Fraud and Economically Motivated Adulteration

Economically Motivated Adulteration (EMA) is a form of food fraud that is generally carried out from within the food sector, with the intent of increasing profits or lowering costs. It may involve selling an inexpensive material at a higher price, or using an inexpensive ingredient to extend or replace a more expensive one. The primary goal of EMA is financial gain through deceiving customers and consumers, but it can also cause illness, injury or death.

About VACCP

Vulnerability Assessment and Critical Control Point (VACCP) is the systemic management of risk through evaluation of different kinds of vulnerabilities throughout the food supply chain. A vulnerability is a status or scenario that can lead to a food fraud incident. The steps below are often applied as part of the VACCP methodology, which is based on the HACCP methodology.

VACCP Prerequisite Programs



Strong receiving and supplier controls at the dock are the foundation on which a VACCP plan is built.

The application of VACCP into food production requires that prerequisite programs for its implementation be documented and applied before the introduction of VACCP plans into the process. VACCP support plans are those that control the status and application of related business activities, often including Procurement, Approved Supplier Management and Production Operations. When implementing a VACCP as part of a food safety and quality program, the primary step is to assess pre-existing programs as to their adequacy and conformance to requirements, and their documented monitoring effectiveness. These support programs form the basis on which VACCP is integrated, and their adequacy will provide success to the system. If the support programs are not controlled as required, the VACCP Control Measures may not be effective. The importance of such programs cannot be overlooked in the scheme of VACCP planning and implementation, as they provide intrinsic support to all facets of the food safety management system.

VACCP Scope and Purpose

A documented Scope and Purpose for the VACCP Plan is necessary to ensure all required products and processes are covered by the associated documentation and management systems:

- The Scope of the VACCP Plan should define the major process steps which are intended to be covered by the extent of the VACCP Plan;
- The Purpose of the VACCP Plan should define the intent of the VACCP Plan regarding the identification and control of hazards. Some VACCP Purposes may require a mention of specified hazards or hazard types, especially where high risk products are concerned.

The HACCP Scope and Purpose Statement is often used to cover VACCP related risk to avoid unnecessary duplication.

Developing the VACCP Team



A multidisciplinary team brings the knowledge needed to identify and assess food fraud vulnerabilities.

The first step in the integration of VACCP into a Food Safety and Quality system is to nominate the team that will oversee the implementation. It is of great importance to include as much knowledge and skill as possible in the team, while also including senior management. The size and scope of the VACCP team will depend on the food industry sectors involved, the classes of vulnerabilities to be addressed and the nature of the food business to which the VACCP system is being applied. As well as internal members, external sources, such as those with relevant experience and/or specialist training can be of great benefit to providing relevance in VACCP implementation. Overall, the team should be efficient, appropriate, and well informed in its addressing of all the relevant aspects of VACCP.

The composition of the VACCP requirements that will be addressed by the VACCP team will need to be suitable and appropriate to include operational aspects of the food business, and display confidence in accounting for technologies, equipment and expertise used in processing. The specific knowledge and skills of the individuals in the VACCP team should allow this, providing the composition of the team is adequate. Senior management should assure that the appropriate product-specific knowledge and expertise is available for the development of an effective VACCP plan. Optimally, this may be accomplished by assembling a multidisciplinary team. Where such expertise is not available on site, expert advice should be obtained from other sources. The scope of the VACCP plan should be identified. The scope should describe which segment of the food chain is involved and the general classes of Vulnerabilities to be addressed.

Teamwork will be the foundation on which any successful food safety and quality program is based. A designated VACCP team made up of both management and other staff is required to ensure the food safety program policies and procedures are continuously improved. Whilst the program must be managed in its entirety, special emphasis must be put on the assurance that the nominated Vulnerability Control Points are monitored and maintained as per the specifications of the program.

The HACCP Team is often used as the VACCP Team to avoid unnecessary duplication.

Product Description

The second step in VACCP implementation involves consideration of the food products that are being produced or handled by the food business. Where a service is being provided rather than a product, a similar method can be applied. The information gathered will assist in the identification of vulnerabilities that may be present in either ingredients or materials used in the processing of food. This step should also include references to appropriate legislative and industry guidelines, or scientific validations regarding the documented Product Description and Intended Use. Generic Product Descriptions may be developed for product groups rather than each individual line where applicable.

The HACCP Product Description documentation is often used to avoid unnecessary duplication.

Identify the Intended Usage

This step allows us to assess whether the product is to be served and consumed immediately, stored or further processed; the expected use of the product by the end consumer. The intended product usage will provide an abundance of information regarding potential vulnerabilities throughout the process flow. Information on intended use is often documented in tabular format with the Product Description.

The HACCP Intended Usage documentation is often used to avoid unnecessary duplication.

Production Process Flow Diagram

The next step is to construct a production process flow diagram using the information gathered above, in conjunction with operational knowledge of the process systems. The production process flow diagram must identify every step that is used to produce the product through the process, from receipt of materials and ingredients to service of the consumer. The diagram need not be complex in its compilation but must involve all processing steps from beginning to end. To assess the validity of the flow diagram it is advantageous to closely follow the process from start to finish by physically following the process. Products may be grouped in the process flow diagram if they are nominated as being suitable to include.

The HACCP Production Process Flow Diagram is often used to avoid unnecessary duplication.

Confirmation of the Production Process Flow Diagram

The production process flow diagram must be validated against on-site observation of production during all stages and hours of operation. The pre-conceived flow diagram must be altered if required for its validation into the food safety system. Reconfirmation of the Process Flow Diagram must be undertaken annually as a minimum or at any time where processes, products or inputs change.

The HACCP Production Process Flow Diagram Confirmation is often used to avoid unnecessary duplication.

Conduct a Vulnerability Assessment and Consider any Measures to Control Identified Vulnerabilities



Inspecting incoming ingredients is one way to identify where substitution or adulteration could occur.

All food fraud vulnerabilities that may reasonably be expected to occur at each step from primary production, processing and distribution until the point of consumption must be identified. Identified vulnerabilities must then be analysed as to their potential and significance. This process should also include emerging issues, which may not be historically evident within a particular process or product, but which may be of concern, regarding the Product Description and Intended Use.

The Vulnerability Assessment should consider the following where applicable:

- Black Market Items;
- Counterfeiting;
- Dilution;
- Economically Motivated Adulteration;
- Mislabelling;
- Substitution.

When the vulnerability assessment has been completed, the VACCP team must then consider what control measures, if any, are applicable for each identified vulnerability. It is acceptable that there may be more than one control measure nominated for a specific vulnerability, and that more than one vulnerability may be controlled by a specified control measure.

The HACCP Hazard Analysis format is often used to capture and ratify Food Fraud Vulnerability risks to avoid

unnecessary duplication.

Determine Critical Control Points for Vulnerabilities

The nomination of a significant Food Fraud Vulnerability should be given consideration for nomination as a Critical Control Point within the VACCP system. This can be determined through application of a CCP Decision tree, commonly based on the Codex CCP Decision Tree. The use of the decision tree should be flexible, allowing for differences in the operational specifics of different production areas. It should be used for guidance while also relying on the intimate operational knowledge available from the VACCP team. Decision tree structures may need to be altered for certain applications where the appropriateness of the critical control point determination is not suitable for verification. Specified training in the use of the decision tree is recommended for appropriate recognition of critical control points. If a hazard has been identified at a step where a control measure is needed, and there is no existing control measure at that step, or any other, the product or process must be modified at that step, or an earlier or later stage to incorporate a control step.

The HACCP methodologies and formats for the determination of Control Points are often used to avoid un-necessary duplication.

Establish Critical Control Limits for Each Critical Control Point



Laboratory testing provides objective evidence that an ingredient is genuine and within its critical limits.

Critical limits for each Critical Control Point must be specified and validated. It may occur that more than one critical limit is nominated at a particular step.

It is important with the determination and nomination of Critical Limits, that only measurable parameters are chosen. This is to ensure that the Critical Limits chosen can be documented as part of monitoring procedures, and that they can be measured at the Critical Control Point, against the nominated Critical Limit, which in turn verifies control of the identified significant hazard. Where non-measurable parameters are chosen, it is difficult to establish whether or not a Critical Control Point is actually under control.

When using numerical values to define limits of acceptability at a CCP, it is important to define the critical limits with an acceptability variant. This may include using symbols or wording which define limits of acceptability, for example:

- Equal to (=);
- Less than or equal to ($\leq$);
- Greater than or equal to ($\geq$);
- Less than ($<$);
- Greater than ($>$).

This will ensure that the intended Critical Limits have a clear distinction between being acceptable and unacceptable.

A key part of the VACCP plan is to form appropriate controls or levels of action entirely based on the outcome of the vulnerability assessment. In the case of raw materials, it is important to request certificates of analysis from suppliers to confirm the genuine and un-adulterated status of the materials being received. The tests or assessments involved must demonstrate the authenticity of the material. The receiving business may also conduct their own raw material testing to see whether the test results provided by the supplier match their own results.

Supply chain audits, mass balance exercises, and enhanced supplier approval and risk assessment may also be scheduled and completed to ensure raw material authenticity as well as ensuring the quality of each delivered sample conforms to relevant specifications.

The HACCP methodologies and formats for the establishment of Critical Control Limits for Control Points are often used to avoid unnecessary duplication.

Establish a Monitoring System for Each Critical Control Point

Monitoring is the scheduled observation or measurement of a CCP in relation to its critical limits. What, How, Where, When and Who should all be considered when developing the monitoring systems for CCPs. The nominated monitoring procedures must be relevant in their ability to detect the loss of control at the CCP. Monitoring should ideally provide information that allows process control to prevent the violation of critical limits. Process adjustments must be made when monitoring indicates a potential loss of control at a CCP before a deviation occurs. All data collected through monitoring must be evaluated by a person who is adequately qualified, with the knowledge and authority to initiate corrective actions when needed. The monitoring frequency, amount and continuity of monitoring must be sufficient to guarantee the CCP is under control. The monitoring of CCPs will need to be done rapidly in most cases, as they most often relate to online processing, and do not allow time for diagnostic testing. Physical and chemical measurements are often preferred to biological testing because they can be done quickly and can be indicative of microbiological control of the product. All documentation and records associated with monitoring must be signed by the person doing the monitoring, and then by those reviewing the system as elements of the verification process.

Monitoring is the ongoing collection of information on a control measure at the step the control measure is applied. The information establishes that the measure is meeting or functioning within established limits. Monitoring activities are typically focused on real-time measurements and are generally focused on the performance of a specific control measure.

The HACCP methodologies and formats for the establishment of Monitoring requirements for Control Points are often used to avoid unnecessary duplication.

Establish Corrective Actions

Corrective actions must be nominated for each CCP in the VACCP system to confront deviations when they occur. The corrective actions must ensure that the CCP has been controlled or brought back into controlled critical limits. All deviation and product character related procedures must be documented as part of VACCP record keeping.

Common motivators for Corrective Action applied within a food business at any given time include:

- Customer complaints;
- Process or Procedure deviations;
- Product non-conformance;
- Observations raised by employees.

The HACCP methodologies and formats for Corrective Actions are often used to avoid unnecessary duplication.

Establish Verification Procedures

Verification includes auditing and assessment, procedures and testing, sampling and analysis. Such techniques are important in determining whether or not the VACCP system is working correctly. The frequency of verification must be sufficient to validate that the VACCP system is working effectively. The verification process is commonly linked to the Continuous Improvement processes nominated within the food safety and quality management systems. Often a Verification Schedule format is developed and documented to define all the verification activities, including frequencies and the responsibilities.

Verification activities may include:

- VACCP system and records review;
- Product deviation and characteristics;
- Critical Control Point management confirmation;

- VACCP plan validity confirmation.

Verification procedures may include:

- Establishment of appropriate verification schedules;
- Review of the VACCP plan for completeness;
- Confirmation of the accuracy of the process flow diagram;
- Review of the VACCP system to determine if the food business is operating according to the VACCP plan;
- Review of CCP monitoring records;
- Review of records for deviations and corrective actions;
- Validation of critical limits to confirm that they are adequate to control significant hazards;
- Scheduled assessment and testing of product and process inputs;
- Validation and re-validation of the VACCP plan;
- Internal audits;
- Scheduled assessments of produce or products against the Product Description and Intended Use, Internal Specifications and Customer Specifications;
- Review of Corrective Action and Customer Complaints;
- Review of modifications of the VACCP plan;
- Sampling and testing to verify CCP effectiveness;
- Management and system review activities.

Verification should be conducted:

- Routinely, or on an unannounced basis, to ensure CCPs are under control;
- At a frequency to meet any government and standard requirements;
- When there are emerging concerns about product or process vulnerabilities;
- To confirm that changes have been implemented correctly after a VACCP plan has been modified;
- To assess whether a VACCP plan should be modified due to a change in the process, equipment and process inputs.

Verification record formats may include information on the presence and adequacy of:

- The VACCP plan and the positions responsible for administering and updating the VACCP plan;
- The records associated with CCP monitoring;
- Direct recording of monitoring data of the CCP while in operation;
- Certification that monitoring equipment is properly calibrated and in working order;
- Corrective actions for deviations;
- Sampling and testing methods used to verify that CCPs are under control;
- Modifications to the VACCP plan;
- Training and knowledge of individuals responsible for monitoring CCPs;
- Validation activities.

The HACCP methodologies and formats for Verification and Validation Activities are often used to avoid unnecessary duplication.

Establish Documentation and Record Keeping

Accurate and efficient record keeping is critical to the validity of any VACCP system. All VACCP documentation and record-keeping should be appropriate in its format, content, control and application to the nature of the food business for which it is constructed.

VACCP Documentation may include:

- VACCP team listing;
- VACCP scope and purpose;
- Product description and intended use;

- Process flow diagram;
- Hazard analysis;
- CCP determination;
- Critical limit determination;
- VACCP audit table;
- Critical limit and control measure verification;
- VACCP verification schedule.

VACCP Records may include:

- CCP monitoring activities;
- Deviations and associated corrective actions;
- VACCP system modifications;
- Outcomes of VACCP verification activities;
- Supplier certification records documenting compliance of an ingredient with a critical limit;
- Audit records verifying supplier compliance;
- Processing, storage and distribution records;
- Information that establishes the ability of a CCP to maintain product safety;
- Data establishing the safe shelf life of the product, if the age of a food product can impact its safety;
- Records indicating compliance with critical limits when packaging materials, labelling or sealing specifications are necessary for food safety;
- Monitoring, Verification, Deviation and Corrective Action records;
- Employee training records that are pertinent to CCPs and the VACCP plan;
- Documentation of the adequacy of the VACCP plan from a knowledgeable VACCP expert;
- VACCP Verification schedule.

The HACCP methodologies and formats for Documentation and Record Keeping are often used to avoid unnecessary duplication.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Fraud Risk Management Development requirements in relation to their items.

Responding to Suspected Food Fraud

Where food fraud is suspected, for example when a delivery fails an authenticity test or a supplier cannot provide evidence of origin, the food business should act promptly and in line with its documented procedures. Common response steps include:

- Product control: Placing affected product on hold and preventing further use or dispatch until an investigation is complete;
- Evidence preservation: Keeping samples, delivery records, certificates, photographs and correspondence, and recording who handled them;
- Investigation: Identifying the product, supplier, batches and quantities involved, and confirming the facts through testing or supplier audit;
- Notification: Informing senior management and, where required, customers, certification bodies and regulators, particularly where food safety may be affected;
- Corrective and preventative action: Reviewing the vulnerability assessment, supplier approval status and controls, and implementing changes through the corrective action and preventative action process.

Every suspected incident should be documented, including each decision made and the reason for it.

Regulatory and Industry References

The following official sources support the concepts on this page. Always check the current edition and the requirements that apply in your jurisdiction and to your customers.

- Global Food Safety Initiative Benchmarking Requirements version 2024: The framework used to recognise food safety certification schemes;
- FSSC 22000 Food Fraud Mitigation guidance (Version 6): Guidance supporting the requirement for a documented food fraud vulnerability assessment and mitigation plan;
- Codex Alimentarius codes of practice: Includes the General Principles of Food Hygiene, on which HACCP-based systems are built.

Food Fraud Risk Management Development Key Points

- Food Fraud Risk Management programs must be developed to meet relevant Regulatory, Industry, and Customer standards and requirements;
- The senior management of your business facilitates a commitment to ensuring adequate resources for the development of your Food Fraud Risk Management program;
- Should you require additional resources for the development of Food Fraud Risk Management program elements, please discuss this with the relevant senior management representative;
- A properly developed Food Fraud Risk Management program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly developed Food Fraud Risk Management program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Documentation

To establish the developed detail in a viewable format to facilitate information.

Documentation

Document: A document provides guidance and/or direction for performing work, making decisions, or rendering judgments which affect the safety or quality of the products or services that customers receive.

Documented policies, procedures, work instructions and schedules form the basis of any food safety and quality management system. The following documentation formats may be considered to ensure ongoing compliance with specified requirements for Food Fraud Risk Management:

- Food Fraud Risk Management policy;
- Food Fraud Risk Management development procedures;
- Food Fraud Risk Management implementation procedures and work instructions;
- Food Fraud Risk Management monitoring procedures;
- Food Fraud Risk Management corrective and preventative action procedures;
- Food Fraud Risk Management verification schedule;
- Food Fraud Risk Management verification procedures;
- Food Fraud Risk Management validation schedule;
- Food Fraud Risk Management validation procedures;
- Food Fraud Risk Management training procedures.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Fraud Risk Management Documentation requirements in relation to their items.

You may wish to visit the Food Fraud Risk Management Templates section of haccp.com for examples of Food Fraud Risk Management documentation, record and resource formats commonly applied within food safety and quality systems.

Food Fraud Risk Management Documentation Key Points

- Food Fraud Risk Management programs must be documented to meet relevant Regulatory, Industry, and Customer standards and requirements;
- All documented Food Fraud Risk Management program elements must be controlled to ensure compliance;
- Key documented Food Fraud Risk Management program elements should be available to your business team at all times to ensure they can facilitate required tasks;
- A properly documented Food Fraud Risk Management program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly documented Food Fraud Risk Management program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Implementation

To facilitate the application of the documentation.

Implementation

Implementation: Implementation is the application of documented food safety and quality system elements into the actual business operation.

The implementation of Food Fraud Risk Management within any food business requires genuine commitment from senior management, staff and visitors to ensure the nominated goals of implementation are achievable on an ongoing basis. It is a step which requires significant planning and consideration of general and specific food business circumstances to ensure the outcomes of Food Fraud Risk Management do not negatively impact upon the safety and quality of the food items dispatched from the business.

Implementation of Food Fraud Risk Management must include the clear definition of responsibilities and authorities for all levels of participation by senior management, staff and visitors to the site.

When implementing Food Fraud Risk Management within a food safety and quality system, you may wish to consider the following requirements prior to completion:

- Communication and display of the Food Fraud Risk Management policy;
- Completion of Verification and Validation of Food Fraud Risk Management development procedures;
- Availability of Food Fraud Risk Management implementation procedures and work instructions;
- Availability of Food Fraud Risk Management monitoring procedures and record templates (where applicable);
- Availability of Food Fraud Risk Management corrective and preventative action procedures and record templates (where applicable);
- Availability of the Food Fraud Risk Management verification schedule;
- Availability of Food Fraud Risk Management verification procedures;
- Availability of the Food Fraud Risk Management validation schedule;
- Availability of Food Fraud Risk Management validation procedures;
- Completion of Food Fraud Risk Management training procedures;
- Completion of product design and development requirements related to Food Fraud Risk Management;
- Completion of process design and development requirements related to Food Fraud Risk Management;
- Completion of training for team members who have responsibilities and involvement within Food Fraud Risk Management;
- Completion of competency approval for team members who have responsibilities and involvement within Food Fraud Risk Management.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Fraud Risk Management Implementation requirements in relation to their items.

Food Fraud Risk Management Implementation Key Points

- Food Fraud Risk Management programs must be Implemented to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Your Food Fraud Risk Management program must be fully implemented as per relevant documented Policies, Procedures, and Work Instructions;
- The implementation of Food Fraud Risk Management requires a commitment to the provision of resources by the senior management of your business;
- A properly implemented Food Fraud Risk Management program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly implemented Food Fraud Risk Management program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Monitoring

To review, confirm and document evidence of the implementation against documented limits.

Monitoring

Monitoring: Monitoring is the act of reviewing and confirming measurable parameters of a defined process or product status.

Monitoring requirements within food industry sectors are generally identified against limits of acceptability defined within Food Fraud Risk Management plans, implementation procedures and work instructions. Monitoring usually includes some element of record-keeping, which may be maintained manually or through digital systems. It is important to consider that advancements in technology have spawned many systems and processes which are self-monitored and/or self-adjusted when variances are identified. Regardless of the system used, the goal of any monitoring activity is to provide sufficient evidence that any limit of acceptability has been met.

Food Fraud Risk Management monitoring requirements include manual recording and the application of corrective actions when the results of monitoring are found to be outside acceptable limits. Corrective Actions should also generally be strongly linked to the monitoring process where applied to ensure full traceability of the applied actions.

Common monitoring activities and record formats may apply to Food Fraud Risk Management:

- Supplier certificate checks: Review of certificates of analysis, certificates of conformance and authenticity documentation against the specification for each delivery;
- Authenticity testing: Scheduled testing of high-risk ingredients against the limits set in the VACCP plan, with results compared to supplier data;
- Mass balance records: Comparison of quantities received, used and dispatched to detect unexplained gains or losses;
- Supplier status monitoring: Tracking of approval status, audit results and changes in ownership, sourcing or pricing for suppliers of high-risk materials;
- Label and packaging checks: Inspection of labels, seals and packaging against approved specifications on receipt.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Fraud Risk Management Monitoring requirements in relation to their items.

You may wish to visit the Food Fraud Risk Management Templates section of haccp.com for examples of Food Fraud Risk Management documentation, record and resource formats commonly applied within food safety and quality systems.

Food Fraud Risk Management Monitoring Key Points

- Monitoring provides real-time confirmation and evidence that your risk-based FS&Q Controls are effectively implemented;
- Food Fraud Risk Management programs must be monitored to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Monitoring of Food Fraud Risk Management must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Nominated monitoring records for Food Fraud Risk Management must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- A properly monitored Food Fraud Risk Management program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly monitored Food Fraud Risk Management program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Corrective Action and Preventative Action

To apply “real time” interventions to documented monitoring limits.

Corrective Action and Preventative Action

Corrective Action: Corrective action is mandatory action to be taken when a deviation to the Quality System occurs, particularly in relation to a Critical Control Point.

Preventative Action: At any step in the process where a hazard has been identified, preventative action must be put into place to prevent recurrence.

Corrective Action and Preventative Action is implemented to ensure that any identified non-conformance issues are documented, investigated and rectified within appropriate timeframes. Corrective action is any action applied to regain control over a product, process, policy or procedure that has been identified as being non-conforming or outside nominated limits of acceptability. Preventative action is any action applied to prevent any identified non-conformance from reoccurring.

The outcomes of corrective and preventative actions should result in regained process control after effective application. Specified corrective actions are commonly linked to the Food Fraud Risk Management Plans and to the food business certification process.

Below are Corrective Action and Preventative Action examples which may be associated with Food Fraud Risk Management related non-conformance:

- Review of the Food Fraud Risk Management policy;
- Review of Food Fraud Risk Management development procedures;
- Review of Food Fraud Risk Management implementation procedures and work instructions;
- Review of Food Fraud Risk Management monitoring procedures;
- Review of Food Fraud Risk Management corrective and preventative action procedures;
- Review of the Food Fraud Risk Management verification schedule;
- Review of Food Fraud Risk Management verification procedures;
- Review of the Food Fraud Risk Management validation schedule;
- Review of Food Fraud Risk Management validation procedures;
- Review of Food Fraud Risk Management training procedures;
- Re-training in Food Fraud Risk Management;
- Review of management review activities to include Food Fraud Risk Management as an agenda item;
- Initiation of product hold procedures where safety or quality may be compromised;
- Initiation of product recall or product recall procedures where investigations show that there is a substantial safety and/or quality risk to the released product;

- Contacting stakeholders including customers regarding any confirmed or potential Food Fraud Risk Management concerns involving their product.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Fraud Risk Management Corrective Action requirements in relation to their items.

You may wish to visit the Corrective Action and Preventative Action section of haccp.com for examples of best practice applications for this food safety and quality system element.

Food Fraud Risk Management Corrective Action and Preventative Action Key Points

- The implementation of Corrective Action and Preventative Action provides confidence that your FS&Q Program is effectively implemented and that FS&Q criteria are being met;
- Where deviations or variations are observed, Corrective Action and Preventative Actions must be facilitated to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Corrective Action and Preventative Action of Food Fraud Risk Management must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Records of Corrective Action and Preventative Action for Food Fraud Risk Management must be maintained per relevant documented Policies, Procedures, and Work Instructions;
- Proper application of Corrective Action and Preventative Action for your Food Fraud Risk Management program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- Poor application of Corrective Action and Preventative Action for your Food Fraud Risk Management program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Verification

To review and confirm documented monitoring and corrective actions against documented parameters.

Verification

Verification: The act of reviewing, inspecting, testing, checking, auditing, or otherwise establishing and documenting whether items, processes, services, or documents conform to specified requirements.

Verification is the detailed review of all food safety and quality system elements to confirm that they are effectively developed, documented, implemented, monitored and reviewed. It is important that all food safety and quality system elements, including documented policies, procedures, training, Food Fraud Risk Management plans and their operational applications are verified on an ongoing scheduled basis. The verification process commonly includes a defined schedule for which verification activities are required, how often they are conducted, who is responsible and detailed documented procedures for each nominated verification activity.

The general goal of an established verification process is to ensure any systemic non-conformance issues are identified and rectified within an appropriate timeframe. When non-conformance issues are identified through the verification process, Corrective Actions and Preventative Actions should be implemented to ensure they do not impact upon the effectiveness of the food safety and quality system.

The following examples of verification activities may be applicable to Food Fraud Risk Management:

- Review of the Food Fraud Risk Management policy;
- Review of Food Fraud Risk Management development procedures;
- Review of Food Fraud Risk Management implementation procedures and work instructions;
- Review of Food Fraud Risk Management monitoring procedures;
- Review of Food Fraud Risk Management monitoring records;
- Review of Food Fraud Risk Management corrective and preventative action procedures;
- Review of the Food Fraud Risk Management verification schedule;
- Review of Food Fraud Risk Management verification procedures;

- Review of the Food Fraud Risk Management validation schedule;
- Review of Food Fraud Risk Management validation procedures;
- Review of Food Fraud Risk Management training procedures;
- Review of Food Fraud Risk Management performance since the last review and historically;
- Analytical testing of product or process to ensure the effectiveness of Food Fraud Risk Management;
- Inclusion of Food Fraud Risk Management as an agenda item within the Management Review Process.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Fraud Risk Management Verification requirements in relation to their items.

You may wish to visit the Verification Activities section of haccp.com for examples of best practice applications for this food safety and quality system element.

Food Fraud Risk Management Verification Key Points

- Your verification program provides evidence that your FS&Q Controls have worked;
- Food Fraud Risk Management programs must be verified to meet relevant Regulatory, Industry, and Customer standards and requirements;
- The verification of Food Fraud Risk Management must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Nominated verification records for Food Fraud Risk Management must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- A properly verified Food Fraud Risk Management program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly verified Food Fraud Risk Management program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Validation

To confirm the documented monitoring or procedural limits.

Validation

Validation: The process of gathering evidence to provide a scientific basis for the documented act of demonstrating that a procedure, process and activity will consistently lead to the expected results. It often includes the qualification of systems and equipment.

Validation is the provision of evidence to support the limits of control or acceptability for food safety or quality parameters nominated within systemic elements. Limits of control or acceptability are commonly included within documented food safety and quality system elements such as procedures, Food Fraud Risk Management plans and specifications.

Common sources of validation include regulatory and legislative standards, finished product specifications and customer requirements, industry codes of practice and guidelines, verified and validated research, historical product and process control outcomes and analytical testing.

The general goal of an established validation process is to ensure any systemic non-conformance issues are identified and rectified within an appropriate timeframe. When non-conformance issues are identified through the validation process, Corrective Actions and Preventative Actions should be implemented to ensure they do not impact upon the effectiveness of the food safety and quality system.

Validation activities are commonly defined within the verification schedules and procedures of established food safety and quality management systems.

The following examples may be applicable to validation of the limits of control or acceptability for Food Fraud Risk Management:

- Confirmation of nominated food safety and food quality control limits for Food Fraud Risk Management. These limits may be applicable to regulatory, industry, customer or finished product specifications;

- Confirmation of analytical testing methods being used to confirm the effectiveness of Food Fraud Risk Management and ensure the accuracy of outcomes;
- Confirmation that critical limits for ingredients and materials reflect specifications, regulatory requirements and customer requirements;
- Review of vulnerability assessment inputs, such as supply chain information and incident history, against current and credible sources.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Fraud Risk Management Validation requirements in relation to their items.

You may wish to visit the Validation Activities section of haccp.com for examples of best practice applications for this food safety and quality system element.

Food Fraud Risk Management Validation Key Points

- Your validation program provides evidence that your FS&Q Controls will work;
- Food Fraud Risk Management programs must be validated to meet relevant Regulatory, Industry, and Customer standards and requirements;
- The validation of Food Fraud Risk Management must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Nominated validation records and supporting documentation for Food Fraud Risk Management must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- A properly validated Food Fraud Risk Management program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly validated Food Fraud Risk Management program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Training, Competency and Resources

Skills, knowledge and competency requirements to facilitate development, documentation, implementation, monitoring, corrective action, verification and validation of every Food Safety and Quality System Element.

Skills and Knowledge

Skills and Knowledge: Skills and knowledge are attributes of human interactions commonly linked to competency within any specified job-related task.

Training and competency requirements for Food Fraud Risk Management must be ongoing, including regularly scheduled reviews to ensure the effectiveness of training and competency outcomes.

Team members who have defined responsibilities regarding Food Fraud Risk Management should have knowledge including:

- Basic Food Fraud Risk Management requirements;
- Positive outcomes of Food Fraud Risk Management;
- Negative outcomes of a lack of Food Fraud Risk Management;
- Current Food Fraud Risk Management procedures, methods and techniques;
- General operational, corporate and social awareness regarding Food Fraud Risk Management;
- Regulatory, industry and customer requirements regarding Food Fraud Risk Management.

Team members who have defined responsibilities regarding Food Fraud Risk Management should have skills including:

- Competency regarding basic Food Fraud Risk Management;
- Effective application of current Food Fraud Risk Management procedures, methods and techniques;
- The basic development, documentation and implementation of Food Fraud Risk Management and Prerequisite

Programs within the food industry sector.

Team members who have defined responsibilities regarding Food Fraud Risk Management should have access to resources including:

- Food Fraud Risk Management training;
- Food Fraud Risk Management associations and events;
- Regulatory standards, industry and customer information and updates regarding Food Fraud Risk Management;
- Incidents within the food industry sector regarding Food Fraud Risk Management;
- Commitment to Food Fraud Risk Management by senior management;
- Suitably qualified food industry professionals with verified experience in Food Fraud Risk Management;
- Effective communication systems including email, internet and phone through which Food Fraud Risk Management information can be sent and received within suitable timeframes.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Fraud Risk Management Training, Competency and Resources requirements in relation to their items.

You may wish to visit the Training, Competency and Resources section of haccp.com for examples of best practice applications for this food safety and quality system element.

Food Fraud Risk Management Training, Skills, and Knowledge Key Points

- Your Training, Skills, and Knowledge program ensures all participating personnel, visitors and contractors have the required skills and knowledge to effectively facilitate the requirements of your FS&Q Program;
- Training, Skills, and Knowledge programs for Food Fraud Risk Management must be facilitated to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Training, Skills, and Knowledge programs for Food Fraud Risk Management must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Training, Skills, and Knowledge records for Food Fraud Risk Management must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- Properly applied Training, Skills, and Knowledge programs for Food Fraud Risk Management will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- Poorly applied Training, Skills, and Knowledge programs for Food Fraud Risk Management will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.



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