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Product fraud prevention plan consists of the procedures, documents and records listed below. Refer to those documents for purpose, scope and responsibilities.

Documents and Records	BRCGS Clause
Product fraud prevention procedure	3.8.1
Vulnerability assessments for product fraud	3.8.2
Product fraud control measures & prevention plan(s)	3.8.2

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Document No.	Previous Rev. No. & Effective Date	Current Rev. No. & Effective Date	Brief Description of Changes

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Terms and definitions

End-to-end supply chain	The steps in the process from raw material source to end user
Product fraud	A collective term used to describe the deliberate adulteration or misrepresentation of food, food ingredients or raw materials for financial gain
Dilution	Mixing a liquid of high value with a liquid of lower value
Substitution	Replacing an ingredient or part of the product of high value with another ingredient or part of the product of lower value.
Concealment	Hiding the low quality of food ingredients or product.
Mislabeling	Placing false claim on packaging for economic gain.
Unapproved enhancement	Adding unknown and undeclared materials to food products to enhance the quality attributes.
Counterfeiting	Copying a brand name packaging concept, recipe, processing method etc of food products for economic gain.
Grey market production/theft/diversion	Sales of stolen or excess unreported product.
Motivation	“A reason or reasons for acting or behaving in a particular way to revenue maximization or cost minimization”
Opportunity	“A time or set of circumstances that makes it possible to do product fraud because of nature of product, quality, production process, geographical origin”.
Control	Company’s primary product fraud controls existing in the company.
Perpetrator	A person who intends to commits, an illegal, criminal, or evil act
Raw material vulnerability	A threat and vulnerability assessment carried out on the raw material supply chain
Vulnerability	How exposed the business is to the threat having an impact on the consumer
VACCP	Vulnerability assessment and critical control point

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PURPOSE

- To protect our products from product fraud-related risks to consumer health.

SCOPE

- Product fraud is the deception, using product, for economic gain. This product fraud prevention procedure aims to prevent, detect and prevent product fraud in our products.
- It assesses vulnerabilities prior to receipt and use of the materials, ingredients and it does not address vulnerabilities within this facility.

Reference

BRCGS- (Version 6)
SSAFE- FFVA tool

PROCEDURES

1) Vulnerability assessments for product fraud

Purpose: The purpose of the vulnerability assessment is to

- Assess the susceptibility of raw materials and products to potential acts of product fraud ,
- Identify potential vulnerabilities,
- Prioritise the vulnerabilities with the purpose of developing preventive and control measures.

Outcome: The outcome is a documented estimate of the vulnerability of each product raw material, ingredients and packaging materials to product fraud, with each being rated as per significant assessment of the risk.

Frequency: The vulnerability assessments are conducted or reviewed and updated as follows:

- at least annually,
- after each actual or potential failure of a preventive measure,
- each time any of the following occurs:
 - New ingredients are to be purchased
 - New products are developed
 - A change of supplier or a new supplier

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- iv) Information about a new incident of product fraud affecting that food type becomes known
- v) A change to supplier auditing regimes
- vi) A significant change to the cost of a material
- vii) Changes to availability of material, for example; seasonal supply issues, war, droughts.
- viii) Changes to material purchasing specifications, procedures or test protocols

2) CONTROL MEASURES TO PREVENT FRAUD

Purpose: To describe action that has been taken or will be taken to reduce or eliminate identified vulnerabilities from potential acts of product fraud .

Outcome: Each product and/or ingredient or raw material that is identified as being at high risk or medium risk of being affected by product fraud will be included in a *(the)* product fraud prevention plan(s). The product fraud prevention plan(s) are controlled within the scope of the food safety management system, are supported by our food safety management system and are in compliance with applicable legislation.

3) PRODUCT FRAUD PREVENTION PLAN

- Product fraud prevention plan will be developed and implemented to prevent the identified product fraud vulnerabilities and it will be reviewed as given below:

Frequency: The product fraud prevention plan(s) will be reviewed and updated as follows:

- a) at least annually
- b) if there is a change to the risk rating from a vulnerability assessment of any product or ingredient or raw material.
- c) if there is a potential or actual failure of an existing preventive measure.

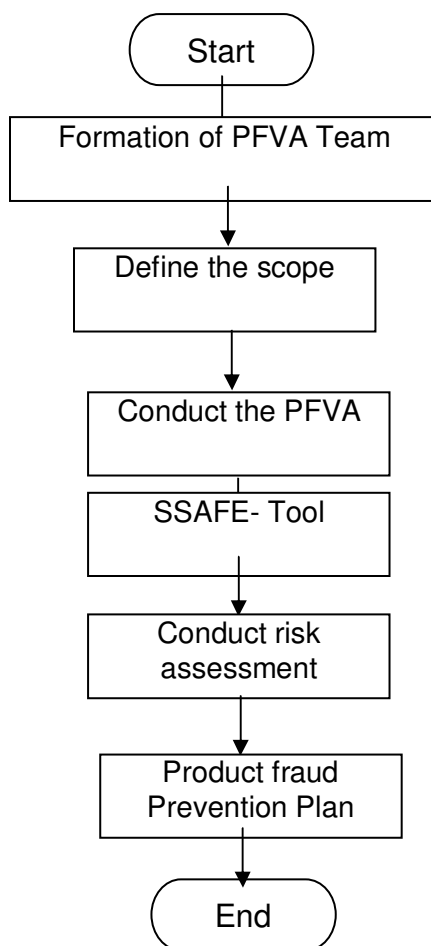
4) REVIEW

This procedure will be reviewed after each actual or potential failure of a preventive measure, and at least annually.

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5. STEPS IN THE ASSESSMENT OF FRAUD VULNERABILITIES AND PLAN



PROCEDURE

1. Formation of Product fraud Assessment Team:

- A multidisciplinary Product fraud Vulnerability Team is constituted PFV Team includes individuals at the facility with experience and knowledge to develop product fraud vulnerabilities in the RMs, Processing aides, Ingredients, Packing materials, Cleaning chemicals etc.

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The VACCP team includes:

Name of Person	Designation	Role	Date of joining the Team
		FDC	
		Member	
		Member	
		Member	
		Member	
		Member	
		Member	

Team members for a raw material vulnerability assessment may include:

- Purchasing
- Supply chain staff
- Production and operations staff - with responsibility and knowledge of acceptance criteria and 'goods-in'
- Technical or technologist - with an understanding of the nature of the raw materials.
- New product development (NPD) - knowledge of NPD activities and current trends will be required to highlight which new ingredients are in the pipeline and what threats these may be vulnerable.

2. DEFINE THE SCOPE

- Raw materials and packing materials included in the study are as given below:

PRODUCT FRAUD VULNERABILITY ASSESSMENT	
Material	Raw materials& ingredients, packing materials, Processing aides, Cleaning chemicals
Name of Unit	
VACCP Team	
Date	

Materials included in the assessment	
Material Group	Raw materials& ingredients, packing materials, processing

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	aides, Cleaning chemicals
Description	1. PTA 2. Chemicals 3. Processing aides 4. Packaging materials 5. Cleaning chemicals
Material name and/or codes included in this assessment	
1. PTA	01
2. Chemicals	02
3. Processing aides	03
4. Packaging materials	04
5. Cleaning chemicals	05

3. CONDUCT PRODUCT FRAUD VULNERABILITY ASSESSMENT:

- Product fraud Vulnerability assessment is conducted by using SSAFE- Tool.
- After administering the tool, the significant vulnerable points are captured from the spider web matrix of SSAFE tool and the Risk assessment is done based on the following parameters:
 - a) Likelihood of Occurrence of fraud
 - b) Likelihood of Detection of Fraud

1. Likelihood of Occurrence of Fraud:

To assess the chances of likelihood of occurrence of product fraud , the score will be given based on the table below:

Likelihood of Occurrence (LOO)	
Definition	Score
Very High	5
High	4
Medium	3
Very low	2
Very low	1

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2. Likelihood of Detection of Fraud:

To assess the likelihood of Detection of product fraud , the score will be given based on the table below:

Likelihood of detection (LOD)	
Definition	Score
It will not be detected- Very low	5
It is unlikely to be detected- Low	4
It is likely to be detected- Medium	3
It is highly likely to be detected- High	2
It will be very easily detected- Very high	1

Based on the above parameters the total Risk Score is calculated by Using the score board.

Risk Score Matrix

Likelihood of Detection	5 (V.Low)					
	4 (low)		Risk B		RiskA	
	3 (Medium)					
	2 (High)	Risk C				
	1 (V.High)					
		1 (V.Low)	2 (Low)	3 (Medium)	4 (High)	5 (V.High)
Likelihood of Occurrence						
High Risk				Risk A		
Medium risk				Risk B		
Low risk				Risk C		

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Based on the assessment using risk score matrix, significant risks which are assessed as High risk and medium risk will be considered for product fraud prevention plan.

Action Plan	
Risk	Parameters
High (Risk A)	Urgent action is required with specific plan, implementation and regular monitoring will be needed.
Medium (Risk B)	Action is needed to reduce the risk with occasional monitoring to mitigate the risk
Low (Risk C)	The activity may proceed with normal supervision after implementing the control measures.

Reference:

1. **SSAFE – Product fraud Vulnerability Assessment Tool** - developed by SSAFE in collaboration with Wageningen University and VU University, Amsterdam.

Records

1. Vulnerability Assessment Plan – Annexure

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