

## **Food Fraud**

### **Relationship between Food Fraud and Food Defense**

Food Defense is meant to protect against the intentional adulteration of food by malicious parties at a large scale. Food fraud is very similar in that it is what the FDA calls “economically motivated adulteration” (EMA). It is still intentional adulteration, but motivated by economic gain, not by terrorism or a desire to hurt others at a large scale. Despite this similarity, however, regulations for food fraud are outlined separately from regulations for food defense. Food fraud rules are outlined in the Preventive Controls (PC) rules (“Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food” and “Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Food for Animals”) and not in the Intentional Adulteration (IA) Rule.

### **FDA vs GMP Programs**

The FDA has indicated they anticipate food fraud preventive controls to be needed only in rare circumstances and “usually in cases where there has been a pattern of food fraud in the past.” While the FDA has indicated they are primarily focused on food fraud that has a known pattern of occurrence and could be a hazard, many GMP standards (particularly the GFSI-recognized standards) require that food fraud is evaluated more broadly. This includes identifying fraud opportunities (such as complex supply chains), individual capability, and “weak signals” of fraud that could include indicators such as price changes for commodities. Therefore, if your facility needs to be GFSI compliant, you will need to implement a food fraud vulnerability assessment and mitigation plan that covers all types of fraud. This includes fraud that only affects quality and it includes counterfeiting, theft, diversion, and gray market production.

### **Scope of the Vulnerability Assessment**

Food fraud assessments are essentially similar to food defense assessments, except that the scope is different. Food Fraud assessments cover all types of fraud (economically motivated adulteration), while Food Defense assessments cover all other types of intentional adulteration. Often the two are combined into a single assessment using the same forms and documentation. However, it is still advisable to distinguish whether the identified hazards and their mitigation plans address food fraud or food defense issues.