

CanadaGAP Training Note

TO: CanadaGAP Auditors, Certification Bodies and Program Participants

DATE: March 24, 2017

SUBJECT: Clarification of Section 23.7 – Food Fraud Requirements

This note provides clarification regarding the intent of the “food fraud” requirements found in Section 23.7: Food Fraud of the CanadaGAP manual(s).

Please note the following key points:

1. The definition in the glossary of the CanadaGAP manuals for food fraud is:

Food Fraud: A collective term encompassing the deliberate and intentional substitution, addition, tampering or misrepresentation of food, food ingredients or food packaging, labelling, product information or false or misleading statements made about a product for economic gain that could impact consumer health.

2. “Consumer Health” means that the food fraud relates to food safety concerns. These are the ONLY types of food fraud that the CanadaGAP program is concerned with (e.g., while misrepresenting an Empire apple for a Honeycrisp apple is a type of food fraud, it does not present a food safety risk).
3. Examples of Food Fraud where food safety may be impacted include:
 - Watermelons injected with forchlorfenuron to increase size
 - Carbide used in fresh fruits to ripen them quicker
 - Oxytocin injected into fruits and vegetables to keep them looking fresh
 - Bleaching mushrooms to improve appearance
 - Replacing an agricultural chemical with a different chemical
 - Dying soy beans green and selling them as green beans (i.e., an allergen risk)
 - Harvesting toxic weeds with leafy greens
4. Food Fraud DOES differ from Food Defense; therefore, both are expected to be considered within the CanadaGAP program. The differences are as follows:

FOOD FRAUD	FOOD DEFENSE
Intentionally adulterating product	
Motivation: FINANCIAL GAIN	Motivation: HARM
Economically driven	Ideologically driven
Risk to consumers through negligence	Deliberate direct risk to consumers

5. Section 23: Deviations and Crisis Management sub-section 23.7 Food Fraud of the CanadaGAP manuals states:
 - Responsibility for food fraud is assigned to a knowledgeable person(s) [record name(s) here: _____]
 - The person responsible assesses potential food fraud vulnerabilities by completing Form (U) Food Fraud Vulnerability Assessment
OR _____
 - The person responsible implements any food fraud mitigation measures identified on Form (U) Food Fraud Vulnerability Assessment
6. Form U must be completed by ALL operations. Auditors will be looking for its completion.
7. The questions are to be answered using a general, common sense approach where the operation demonstrates they are mindful of what is being asked about their product, company, suppliers and inputs.
8. Read the questions carefully and answer appropriately Yes or No.
9. At this time, the operation is not expected to obtain or provide additional documentation such as financial statements, employee screening reports, results of criminal record checks, evidence of compliance with codes of conduct, etc. before or during an audit.
10. The answers and completion of the form show the operations due diligence and awareness of food fraud. That is what is required at this time.