

National Food Crime Unit – Annual Update

FSA 24/12/08 - Report by Junior Johnson and Andrew Quinn

1. Summary

1.1 This report details the activities and achievements of the National Food Crime Unit (NFCU) from the period of December 2023 to October 2024.

1.2 The Board is invited to:

- **Note** the NFCU's performance, operational achievements and impact on the protection of the public (supported by new measures) for 2024.
- **Note** the activities undertaken to ensure the right internal governance and controls are in place so that the additional powers, once obtained, are used lawfully and appropriately.
- **Agree** the four areas of NFCU focus for the coming year.

2. Introduction

2.1 During 2024, the NFCU published, in collaboration with Food Standards Scotland (FSS), a refreshed Food Crime Strategic Assessment (FCSA), made strong progress against our agreed Key Performance Indicators (KPIs) and developed new measures to show impact. We also took steps to evolve our capabilities and continued work to secure additional powers for our Food Crime Officers. The NFCU also continued to support industry, local authority partners and other government departments to strengthen the lines of defence.

3. Understanding and Responding to the Threat Picture

3.1 The food crime landscape remains complex and dynamic, and we need to evolve the way we work. We enhanced our understanding of the threats and vulnerabilities through the completion of a new FCSA, in collaboration with FSS.

3.2 The report revealed that UK food remains safe and authentic. However, new drivers for food crime have emerged from recent geopolitical events and associated disruptions in the wider food chain, offering criminals new opportunities for diversification. We know more about these individuals linked to UK food crime and their links to serious organised crime. The strategic insight from the FCSA informed a refresh of the NFCU's Control Strategy Priorities.

3.3 Two priorities were removed from our Control Strategy. Firstly, dangerous non-food was removed because of the reclassification of 2,4-dinitrophenol (DNP) ([footnote 1](#)) as a poison and the subsequent transfer of responsibility to policing partners. Furthermore, there has been a reduced

online presence of the advertising and sales of Miracle Mineral Solution (MMS) [\(footnote 2\)](#) .

3.4 Secondly, illicitly gathered shellfish was also removed as a priority due to a fall in reported instances of unlawful harvesting and poaching of shellfish, also observed by partners. Changes in export rules post-EU exit has also made it less commercially viable.

3.5 Our new priorities for the financial year 2024/25 were:

- Misrepresentation of red meat and poultry, with regards to status or origin.
- Waste diversion, including redating, and Animal By-Product handling within red meat and poultry supply chains.
- Food crime servicing demand for culturally preferred products in pork and lamb supply chains.
- Specific supply chains presenting high levels of authenticity risk to the UK including herbs and spices, honey and organic claims.

3.6 The NFCU further enhanced our food crime knowledge through the progression of Strategic Intelligence Requirements [\(footnote 3\)](#) (SIRs). Since the start of the financial year, the NFCU has achieved an overall improvement rate of 29% for its 31 identified SIRs, against an annual target of 40%. This progression has led to improvements in our understanding around the vulnerabilities in animal identification practices, importation of illicit pork products, and the misrepresentation of country of origin.

4. Recording Impact Against Food Crime

4.1 National Disruptions [\(footnote 4\)](#) and NFCU Outcomes [\(footnote 5\)](#) remain key measures of our effectiveness. We are on target to exceed our KPIs for the financial year. In the first two quarters, the NFCU achieved 41 disruptions and 74 outcomes, against annual targets of 55 and 80. See [Annex 1](#).

4.2 The NFCU also continued to monitor operational efficiency through the percentage of operations closed with a recorded disruption or outcome. 62% of operations closed had achieved this by the end of quarter 2, against a target of 50%.

4.3 New measures were developed to illustrate the impact of the NFCU's work on the protection of the public. NFCU activity with partners has resulted in 18.8 tonnes of illicit product being removed from sale.

4.4 We also continued to achieve judicial outcomes, notwithstanding national delays in the criminal justice system. These included:

- Obtaining prison sentences for three defendants who conspired to commit fraud and acquire criminal property relating to poultry, amounting to a loss of £318,347.
- Supporting the Gangmaster Labour Abuse Authority (GLAA) in Northern Ireland, through intelligence and financial investigative capabilities, to secure a three-year suspended prison sentence for a defendant suspected of acting as an unlicensed gangmaster to illegally

gather and process shellfish. Further work is underway to secure a Confiscation Order to target criminal profits thought to be around £250,000.

- Leading a multi-agency investigation resulting in a joint prosecution between the FSA and Trading Standards and a fine for the defendant of £50,830.75. The defendant pleaded guilty to a number of regulatory offences, which included the falsification of salmonella testing certificates, meaning that birds had been slaughtered for the food chain without proof they were disease-free.
- Supporting a local authority with a case resulting in fines totalling £36,642 for three defendants operating an illegal 'smokies' [\(footnote 6\)](#) business.
- Securing a further £23,000 from the Op ATLAS defendant, convicted of selling DNP and imprisoned in 2021. In a law enforcement first, one of the NFCU's trained financial investigators confiscated and sold off £15,000 of Monero [\(footnote 7\)](#) cryptocurrency, with the remainder of the money coming from cash and other assets.
- Supporting FSA Legal to secure a sentence for a defendant who was found guilty of obstructing FSA staff whilst attempting to conduct an unannounced inspection. The defendant was sentenced to a fine of £500, victim surcharge of £200 and prosecution costs of £12,118.
- Obtaining a Community Order for a defendant who pleaded guilty to being involved in the supply of unfit meat. The defendant is now required to complete 80 hours of unpaid supervised work during a period of 12 months. The defendant will also be subject to a Confiscation Order.

5. Enhancing Prevention Capabilities

5.1 [Annex 2](#) outlines the NFCU's holistic 4P approach to food crime, as defined by the Home Office. Enhancing the FSA's food crime prevention response was a particular focus of 2024. We made improvements by expanding our Prevention Team, investing in additional training, enhancing existing products (such as our [Food Fraud Resilience Tool](#)) and extending the NFCU's reach to new audiences through new products. We also explored joint working with the Incidents & Resilience Unit (IRU).

5.2 We are also better able to recognise and record the impact of our prevention capabilities, achieved through staff training and refinements to our case management system. By the end of Q2 of the financial year, 27% (11) of the disruptions recorded by the NFCU were achieved by the Prevention Team, compared to 2% the previous year, see [Annex 3](#).

5.3 Prominent disruption achievements included:

- The implementation of new prevention practices by seven industry partners after completing the NFCU's [Food Fraud Resilience Tool](#).
- An NFCU-delivered food fraud webinar being used, by a national third-party assurance scheme, to educate industry members when they received a food fraud related non-compliance. The webinar has been viewed 455 times and used for 20 direct referrals to

date.

5.4 The NFCU also enhanced the impact of the Food Fraud Resilience Tool. In addition to generating nine disruptions, a 10% increase in respondent requests for further engagement has been observed (see [Annex 4](#)). For example, an organisation operating in a sector at high risk of authenticity issues, requested a more in-depth fraud resilience assessment from our Prevention Team. Following the assessment, the organisation developed a new counter-fraud strategy, integrated food fraud into its authenticity monitoring procedures and increased awareness of food fraud with staff.

5.5 Following evaluation of the Tool's responses (see [Annex 5](#)) and industry feedback, the NFCU will focus prevention activities in 2025 towards small and medium sized enterprises.

5.6 We also continued efforts to raise the profile of food crime through our outward messaging. Revisions were made to the industry newsletter to reinforce its role within the NFCU's work to expand the breadth of channels for preventative messaging. This will complement ongoing work to ensure real-time operational intelligence is shared appropriately.

5.7 [New industry food fraud desktop exercises](#) have been established that aim to increase industry understanding of the steps to take during a food fraud incident. 23 attendees from a range of industries attended the first sessions in October 2024 at the Cardiff Metropolitan University. Feedback so far has been extremely positive, with the University wanting to run these exercises regularly.

5.8 The NFCU and IRU also explored a new innovative way of working through the launch of a joint Operations Prevention Plan. The plan has led to more cohesive industry engagement and a collective expansion of knowledge. This is being further explored as a blueprint for wider FSA prevention collaboration.

6. Evolving Our Food Crime Response

6.1 Due to the complex and dynamic nature of food crime, it remains paramount that the NFCU continues to evolve and strengthen our response.

6.2 Those who commit food crime offences are increasingly also involved in other criminality. Organised Crime Group (OCG) mapping remains an innovative way for the NFCU to coordinate the life-time management of offenders in conjunction with partners. We continued to disrupt our two mapped OCGs, with key themes including disrupting business operations and removing unfit food from the food chain. A third OCG is currently being assessed.

6.3 The NFCU recently secured a contract with the National Crime Agency that will enhance our access to digital forensic capabilities and enable us to utilise more efficient and effective tools to conduct reviews of bulk digital data in fraud cases.

6.4 The NFCU financial investigators acquired new search and seizure powers to secure assets held by a defendant for confiscation proceedings under Part 2 of the Proceeds of Crime Act (POCA).

6.5 Our work under Regulation of Investigatory Powers Act 2000 (RIPA) was subject to a recent inspection by the Investigatory Powers Commissioner's Office (IPCO). The results were positive overall, with two improvement areas identified. Actions have already been completed to address these areas.

Powers

6.6 The NFCU continues to work hard to secure additional powers for our Officers in England and Wales, which would enable Food Crime Officers to conduct investigations more effectively, at pace, with more independence and under the appropriate scrutiny.

6.7 We have pursued, and will continue to explore, options to lay the primary legislation to bring our work on food crime under the inspection of His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), which despite our best efforts is yet to come to fruition.

6.8 In the interim, HMICFRS have offered to undertake this oversight on a voluntary arrangement, which will allow, subject to Ministerial approval, statutory instruments to be laid relating to access to powers and oversight of powers complaints by the Independent Office for Police Conduct (IOPC). The NFCU remains hopeful that both statutory instruments can be laid, and their provisions come into force, in spring 2025.

6.9 In preparation for the additional powers, the NFCU has worked with partners, to develop a comprehensive implementation plan that refines our internal governance and controls to ensure the powers granted to us are used lawfully, appropriately and effectively. Additionally, that our use of such powers will withstand any external scrutiny. Activities, thus far, have included:

- Providing bespoke training to eligible NFCU staff around the appropriate use of the powers, through an external company. Appropriate continuous professional development opportunities have also been designed.
- Designing internal oversight and approval procedures for operational activity where powers will be utilised. These will be overseen by highly experienced Senior Investigating Officers who are accredited by the College of Policing to their highest standards of both PIP3 and PIP4 [\(footnote 8\)](#) levels.
- Designing an internal complaints procedure with the wider FSA complaints team.
- Engaging with IOPC to understand and implement any requirements to enable them to provide oversight of any complaints, which includes securing the services of the National Crime Agency to provide complaint investigation support when necessary.
- Engaging with HMICFRS to enhance our understanding of NFCU responsibilities regarding their inspections to ensure we are operating correctly and using the new powers responsibly.

7. Strengthening the Lines of Defence through Partnership Working

7.1 Strong working partnerships remain critical to the NFCU's work and wider collective capabilities, both nationally and internationally.

7.2 We continued training delivery to support local authorities, with colleagues in FSA's Regulatory Compliance Division. Face-to-face sessions were delivered across England, Wales and to all 11 District Councils in Northern Ireland. Sessions focused on increasing understanding of the NFCU's work, how to recognise and record intelligence and investigative skills. The Food Crime Intelligence eLearning module, aimed at LA officers, was also completed for the 500 time this year, since its launch in 2021.

7.3 The FSA are supporting the Department for Environment, Food & Rural Affairs (Defra) in their continuing management and response to the risk of the introduction of African Swine Fever (ASF) to the UK because of the illicit importation of pork and pork products from affected regions of the EU. These efforts look to mitigate the risk of an outbreak through pork from ASF countries entering the UK feed chain for pigs.

7.4 The NFCU is co-ordinating this FSA activity, delivered through a [4P response](#), which comprises enhanced departmental and cross-government collaboration, focused operational activity and ongoing intelligence analysis. This will assist the NFCU to determine if illicit importation of pork is facilitated by fraud offences.

7.5 This collaborative work also generates intelligence for dissemination to LA partners to enable prompt and appropriate actions when a product posing risk of ASF is identified inland.

7.6 The NFCU coordinated partner activity across the UK, with FSS, under the OPSON XIII banner ([footnote 9](#)). The activity focused on country of origin of meat products and the findings are outlined in [Annex 6](#). Some non-compliances were identified, and there were positive benefits to proactively exploring this potential risk area. The issues identified were followed-up by the relevant local authorities.

7.7 We also continued to strengthen international relationships through participation in the Global Alliance ([footnote 10](#)) with joint work underway on a commonly agreed food fraud risk. The NFCU also contributed to the drafting of guidance on the prevention and control of food fraud within the framework of Codex Alimentarius ([footnote 11](#)), which is now proceeding to be considered for adoption by the Codex Alimentarius Commission.

7.8 The NFCU is engaging with counterparts in Germany and Italy through workshops examining areas of common threat and where mutual interest can focus learning opportunities. We were also thanked for contributions to a [Swedish Government inquiry](#) into controlling fraud within food supply chains, published in June 2024.

7.9 The NFCU has further work planned with FSS to strengthen the pan-UK food crime response. A new project will focus on reducing vulnerabilities in the meat supply chain and we are also exploring joint horizon scanning activities.

8. Conclusions

8.1 The NFCU's key priorities for the year ahead will be to:

- Negotiate the challenges, brought about by the national delays within the criminal justice system, to continue to deliver impactful disruptions through successful prosecution for the most serious offenders.
- Maintain the hostile environment for food crime offenders through impactful prevention work and supporting the development of resilience across all lines of defence, with an enhanced focus on small and medium enterprises.

8.2 Progress towards securing additional powers through working with government partners towards legislation and putting interim arrangements in place for scrutiny.

- Continue efforts to maximize impact on disrupting criminals and become more effective and efficient through continuous improvement activities within the FSA's overall approach to

protecting the public.

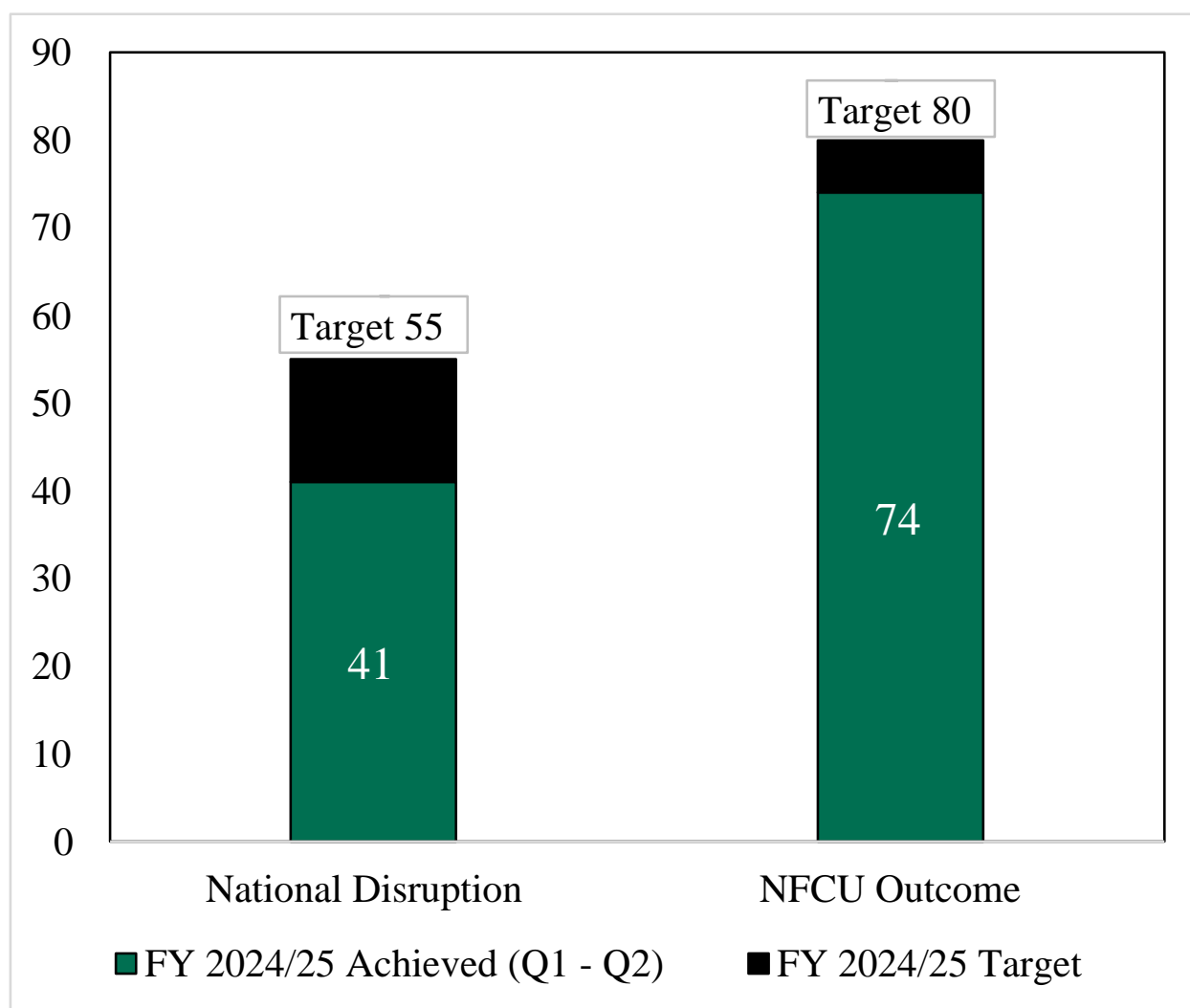
9. Recommendations

9.1 The Board is invited to:

- **Note** the NFCU's performance, operational achievements and impact of protecting the public (supported by new measures) for 2024.
- **Note** the activities undertaken to ensure the right internal governance and controls are in place so that the additional powers, once obtained, are used lawfully and appropriately.
- **Agree** the four areas of NFCU focus for the coming year.

Annexes

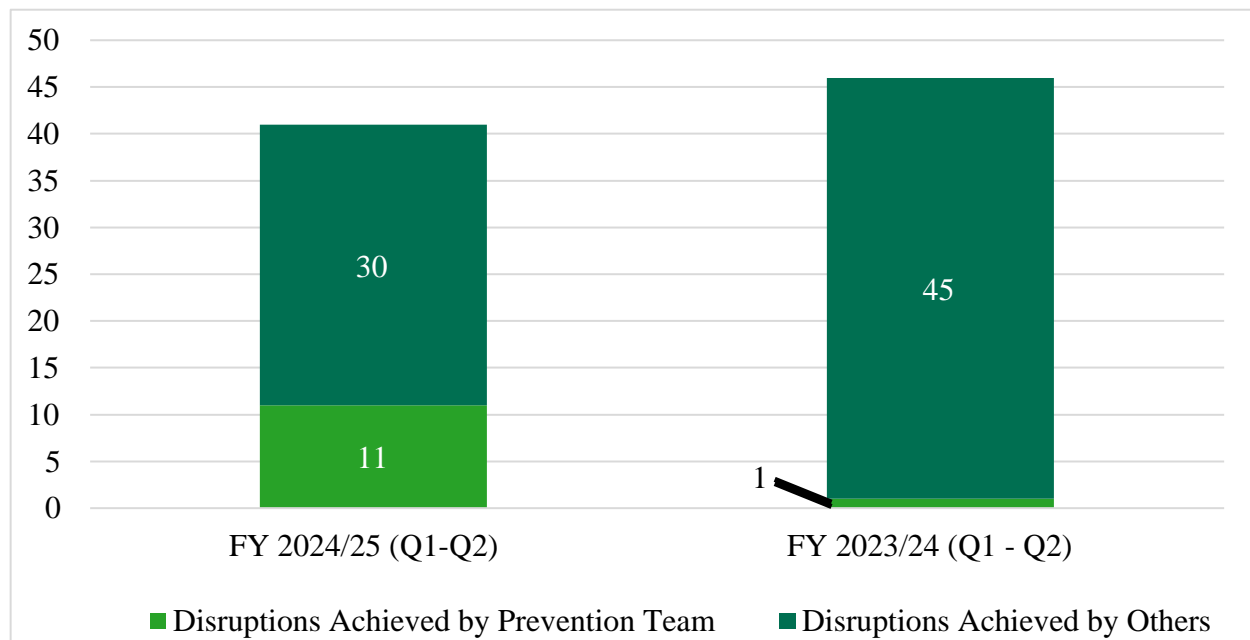
Annex 1 – Results Performance against Targets



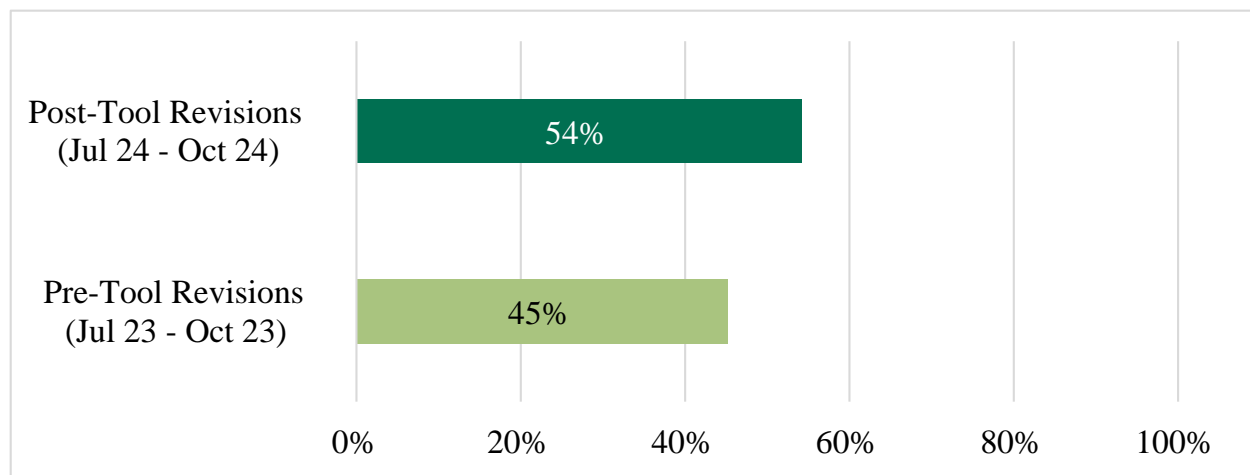
Annex 2 – Outline of the 4P Approach to Food Crime

| 4P | Description |
|---------|--|
| Prepare | <p>Ensure the necessary capabilities exist to tackle food crime.</p> <p><i>This can include the development of learning resources for partners and the provision of online tools to consider fraud vulnerability, as well as the completion and publication of intelligence assessments.</i></p> |
| Pursue | <p>Confiscate the proceeds of food crime and prosecute offenders.</p> <p><i>Investigations and other activity to develop intelligence towards a point where it can drive interventions, as well as activity to remove the financial benefits of food crime from offenders after conviction.</i></p> |
| Protect | <p>Reduce the vulnerability of businesses and consumers to food crime threats and risks.</p> |
| Prevent | <p>Stop individuals/ businesses from committing food crime.</p> <p><i>This can include the introduction of further checks by online platforms to detect and remove listings selling fraudulent or dangerous productions, as well as the deterrent effect which can derive from the publicity surrounding NFCU activities such as prosecutions.</i></p> |
| | |

Annex 3 – Disruptions Achieved by Prevention Team



Annex 4 – Summary of Food Fraud Resilience Tool Further Engagement Requests



Annex 5 – Food Fraud Resilience Tool Demographics (YTD until Q2 24/25)

Annex 6 – Summary of OPSON XIII Results

| Geographical Area | Products Tested | Checks Completed | Non-compliances Found | Types of Non-compliance |
|-----------------------------|---|------------------|-----------------------|--|
| England, Wales and Scotland | Beef shipments entering the UK | 62 | 18 | <ul style="list-style-type: none"> • Business registration. • The provision of traceability information. • Accuracy of marketing material. • Compliance with labelling requirements. |
| Northern Ireland | Beef and chicken products sold by retailers | 43 | 12 | <ul style="list-style-type: none"> • Various minor labelling matters. |

1. DNP is a toxic chemical marketed illegally as a fat burner.
2. [MMS](#) stands for a variety of product names and typically describes a solution containing sodium chlorite, which at high strengths is used as a bleach. It has been marketed as a cure for a variety of health issues.
3. SIRs are identified intelligence gaps relating to our control strategy priorities. These are specific questions which we feel should be the focus of intelligence gathering to improve our knowledge of food crime.
4. National Disruptions are a validated law enforcement framework that measure when the NFCU has had a direct impact on serious organised food crime relating to UK food supply chains.
5. An NFCU Outcome is defined as any action led, supported or co-ordinated by the NFCU that falls short of disrupting serious organised crime and therefore a national disruption but still, develops capacity and capability to identify and deal with food crime or; deters potential offenders from acting dishonestly or; improves awareness of vulnerabilities and promotes the taking of action to improve protection thereof.
6. A 'smokie' is a food prepared by the illegal process of blowtorching the fleece from the unskinned carcass of a sheep or goat and carries significant risk to public health due to the nature of the product and the production method both increasing the risk of harmful microorganisms being present.
7. Monero cryptocurrency is a privacy coin that cannot be tracked and traced. It has been adopted by criminals to conducting transactions on the dark web, making it very difficult to convert to cash.
8. The [Professionalising Investigation Programme](#) (PIP) are national standards levels for investigator skills and accredited by the College of Policing.
9. OPSON is an international initiative targeting counterfeit and substandard food and drink.
10. The Global Alliance is a coalition of international leaders who have agreed to work together on the prevention, detection and disruption of food crime.
11. The Codex Alimentarius is a collection of standards, guidelines and codes of practice adoptions by the [Codex Alimentarius Commission](#).