

National Food Crime Unit – Annual Update

FSA 25-12-06 - 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 November 2024 to November 2025.

1.2 The Board is invited to:

- **Note** the NFCU's performance, operational achievements and impact of protecting the public for 2025.
- **Note** the NFCU has now taken on PACE powers and has governance in place to ensure lawful use.
- **Agree** the four areas of NFCU focus for the coming year.

2. Introduction

2.1 In its tenth year, the NFCU has secured multiple convictions across key investigations, strengthened international partnerships, and advanced Prevent activity to reduce food crime risk. Capabilities were enhanced through new enforcement powers for Food Crime Officers and further mapping of Organised Crime Groups (OCGs). Collaboration with other FSA teams - particularly on sampling and illegal meat - has been central to delivering shared outcomes and aligning efforts to identify, act and prevent crime across the food system. Strategic partnerships with industry, Local Authorities, and government departments have also been further reinforced.

3. Understanding and Responding to the Threat Picture

3.1 The NFCU Control Strategy is based on an assessment of all available food crime intelligence and sets out the Unit's main priorities for tackling food crime. The 2025/26 Control Strategy priorities are:

- Misrepresentation of lamb, beef, poultry and dairy with regards to origin.
- Misrepresentation of lamb, beef and poultry with regards to status (including stolen livestock or meat considered unfit for the food chain).
- Adulteration and substitution of lamb, beef, poultry and dairy products.
- Waste diversion including Animal By-Product (ABP) handling within red meat, poultry, dairy and feed supply chains.
- Specific supply chains presenting high levels of authenticity risk to the UK.

3.2 These priorities inform our Strategic Intelligence Requirements (SIRs), which are key questions used to guide intelligence gathering and improve our understanding of food crime in these key threat areas. An example of an SIR that we have progressed this year related to drivers for fraud in the UK herbs and spices market. Through targeted sampling and collaborative

work with local authorities and industry, we developed a better understanding of emerging threats, allowing us to issue an industry alert and to launch operations targeting sampling failures.

3.3 The Control Strategy priorities now include dairy products due to an increase in intelligence in relation to the adulteration and substitution of premium cheese, coupled with observed economic pressures in dairy supply chains.

3.4 Adulteration and Substitution of lamb, beef, poultry and dairy is a new Control Strategy priority for 2025. The NFCU is using evidence gathered through sampling and intelligence on specific high risk supply chains to emphasise threats to industry and issuing alerts to disrupt the flow of adulterated products to the UK market.

3.5 Food crime servicing community demand in lamb supply chains was removed from the Control Strategy because we have significant knowledge now from operational and intelligence activity (for example, relating to the production and distribution of smokies ([footnote 1](#))). There is, however, a lack of intelligence relating to illegal pork imports which the FSA is seeking to address through our collaborative response to the wider strategic threat of illegal meat with our African Swine Fever (ASF) action plan. We are also working closely with the Department for Environment, Food & Rural Affairs (Defra) and Home Office officials on the cross-government response to illegal products of animal origin (POAO).

4. Our Impact on Food Crime

4.1 A key priority outlined in the 2024 Annual Report was 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.' The NFCU continues to engage with senior Crown Prosecution Service lawyers on live investigations that are awaiting charging decisions to ensure that the national food crime threat is understood by these key decision makers.

4.2 National Disruptions ([footnote 2](#)) and NFCU Outcomes ([footnote 3](#)) remain important measures of how effective we are at tackling the food crime threat. We remain on track to meet our set targets for 2025/26. The target for National Disruptions was increased from 55 set for 2024/25, to 60 for 2025/26. The target for NFCU Outcomes was increased from 80 to 130 for 2025/26.

4.3 Numerous operational results were achieved during the last twelve months, the highlights of which can be found in [Annex A](#).

4.4 The wider FSA has played a pivotal role in the NFCU's operational successes this year. Field Operations provided critical frontline expertise, with evidence from Unannounced Inspections (UAs) contributing to several successful judicial outcomes. FSA Legal also played a key role, offering strategic advice and supporting successful prosecutions. These collaborative efforts highlight the value of a joined-up approach across the agency.

5. Enhancing Prevention Capabilities

5.1 A key priority outlined in the 2024 Annual Report was to '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.' The NFCU continues to learn from previous prevention activity and continues to invest in, evolve and improve its response to emerging risks. The FSA Operations Prevention Plan, in place since April 2024, has enabled closer collaboration between NFCU Prevention and FSA Incidents to deliver a more coordinated and efficient approach to industry outreach. Joint efforts have this year focused on engaging small and medium sized enterprises (SMEs) and online sales

platforms. The NFCU now regularly attends the FSA Incidents-led Food Industry Liaison Group and other forums, helping to ensure that consistent and accessible prevention messaging is understood.

5.2 Prevention activity has made a meaningful contribution to the NFCU's National Disruptions in 2025, with 10 recorded disruptions directly linked to industry engagement with the online food fraud resilience tool. The impact of Prevention activity has been further strengthened by proactive outreach from the NFCU's certified counter-fraud officers, who have promoted clear reporting routes into the NFCU. One such engagement led to new intelligence from a source previously unaware of the NFCU's role, directly triggering a new investigation resulting in the confiscation of 16 tonnes of misrepresented rice in counterfeit packaging.

5.3 In 2025, the NFCU Prevention & Relationship Management team trained 103 food industry professionals through seven in-person sessions, with nearly half of attendees from SMEs. Each session immerses participants in sector-specific, experiential food crime scenarios, supported by practical food crime prevention guidance. Feedback has been very positive, with businesses reporting stronger connections and the introduction of new policies to improve food crime resilience. The growing impact of their work was evident in the increased engagement from businesses, which began dedicating senior technical teams to attend bespoke sessions, reflecting a substantial resource commitment.

5.4 The NFCU has issued two food crime alerts to industry so far in 2025 - one on document fraud in laboratory certificates and another on dye-adulterated saffron. One alert was issued in 2024. These alerts involved coordinating input from internal and external stakeholders. The saffron alert in particular drew on support from the Seasoning & Spice Association, and the Food Authenticity Network (FAN) [\(footnote 4\)](#) as well as teams across the FSA.

5.5 In November 2025, the NFCU Prevention and Relationship Management team launched third party auditor food crime training, which was one of the Food Fraud Working Group [\(footnote 5\)](#) recommendations for the NFCU. Two sessions were delivered to 30 food safety professionals involved in auditing food businesses through standards bodies such as Red Tractor, the Brand Reputation through Compliance Global Standards (hosted in Birmingham), and the Soil Association (hosted in Bristol). The training is designed to strengthen auditors' ability to identify signs of food crime and take appropriate action. The programme aims to boost auditor confidence in detecting and reporting food crime.

5.6 The NFCU liaised with the Food Industry Intelligence Network (FIIN) [\(footnote 6\)](#) when they were creating their new hub for SMEs which has ensured clear signposting to FSA and Food Standards Scotland (FSS) food crime tools. This has enabled smaller food businesses to access up to date information on authenticity trends in food commodities.

5.7 Since November 2024, the NFCU has worked with media outlets to produce 75 articles reaching over 2 million people, raising awareness of food crime and reinforcing the importance of cross-sector collaboration and public vigilance. A media campaign marked the ten-year anniversaries of the NFCU, FIIN, and FAN, celebrating the success of these food crime resilience structures established following the Elliott Review into food supply integrity after the 2013 horsemeat incident.

6. Strengthening the Lines of Defence through Domestic Partnership Working

6.1 Working across different organisational and sector boundaries remains central to the NFCU's operations and to strengthening broader collective capabilities. Domestic partnerships are essential for sharing intelligence, coordinating enforcement efforts, and enhancing the overall impact of food crime prevention and response.

6.2 The NFCU leads the FSA's response to African Swine Fever (ASF), working with FSA teams across Incidents, Imports, RCD, and International to share prevention strategies and reinforce messaging. As part of this project, we have strengthened partnerships with FSS, Defra, the Animal and Plant Health Agency, and Local Authorities. This collaboration supports wider government efforts to manage the risk of ASF entering the UK via illicit imports of pork products from affected EU regions. Key achievements of this project include the removal of 40.5 tonnes of unfit POAO from the food chain, valued at £474,000, and 47 enforcement outcomes across 24 Local Authorities in England.

6.3 We remain alert to the proposed changes under the new Sanitary and Phytosanitary (SPS) agreement. As this primarily concerns the legal importation of commercial goods, it is not expected to have a significant impact on NFCU operations. We will however continue to monitor intelligence for any potential fraudulent opportunities rising within any new import systems.

6.4 The NFCU is developing new partnerships across the UK, including with the Insolvency Service, the Driver and Vehicle Standards Agency (DVSA), and the National Rural Crime Unit (NRCU). The Insolvency Service supports disruption of serious and organised criminals, while the DVSA has helped identify and target distribution networks for illegally smuggled meat. Collaboration with NRCU has focused on understanding links between livestock theft and food crime, with the aim of preventing stolen livestock from entering the food chain.

7. Strengthening the Lines of Defence through International Partnership Working

7.1 The NFCU are working with FSS as part of the UK's work to build relationships internationally under the Strategic Food Safety Dialogue, to improve the international horizon scanning capability with Global Alliance [\(footnote 7\)](#). The NFCU made significant contributions to Global Alliance's first international problem profile paper and the international food crime prevention guidance, due for circulation in 2026.

7.2 In 2025, the NFCU shared operational and prevention guidance bilaterally with other nations and identified new partnership opportunities around food crime risks linked to premium goods with Geographic Indicators. Engagement with Italy's Central Inspectorate for the Protection of Quality and Fraud Repression of Agri-Food Products (ICQRF) included in-person workshops in both countries. This led to the identification of common threats and the signing of a Memorandum of Understanding to formalise this new partnership.

7.3 The NFCU has presented to the French National Veterinary and Phytosanitary Investigation Unit (BNEVP) on food crime and has also developed a partnership with the newly formed European Food Fraud Community of Practice (EFF-COP). This has led to an increase in engagement and learning with international partners regarding food crime prevention pursuit and resilience.

7.4 Every year we participate in operation OPSON, an international initiative to tackle counterfeit and substandard food and drink. This year's OPSON activity involved 32 Local Authorities and District Councils across the three nations, targeting key threat areas. Over 300 samples were taken and tested during the collection phase. This included a trial of innovative rapid screening technology for herb and spice authenticity. Analysis of the samples revealed some failures, resulting in two product recalls, one industry alert, one international enquiry, 51 new pieces of intelligence and 25 outcomes across Wales, Northern Ireland and England.

8. Evolving Our Capabilities

8.1 The NFCU has evolved its capabilities in some key areas, most notably taking on PACE powers. This was identified as a key priority in the 2024 Annual Report that was achieved in March 2025 with the FSA laying two Statutory Instruments (SIs) before Parliament.

New Investigatory Powers

8.2 These SIs granted enhanced investigatory powers under the Police and Criminal Evidence Act 1984 (PACE) and the Criminal Justice and Public Order Act 1994 (CJPOA), while also conferring functions upon the Independent Office for Police Conduct (IOPC) to oversee their use. These new powers for authorised Food Crime Officers in England and Wales enhance the NFCU's ability to progress investigations more efficiently. They relate to securing search warrants, evidence handling, and suspect interviews, and do not include powers of arrest.

8.3 All Food Crime Officers granted PACE powers have completed mandatory FSA training covering search and seizure, custody procedures, interviews, special warnings and disclosure. Competency is demonstrated through operational activity, continuous professional development, and assessment by the NFCU Head of Investigations. Officers hold valid Emergency First Aid certificates and are trained in personal safety and conflict resolution to ensure field readiness.

8.4 Food Crime Officers are committed to using these new powers proportionately, with robust safeguards and oversight to ensure public safety and prevent misuse. The NFCU has worked closely with the Independent Office for Police Conduct (IOPC) and the FSA Standards team to establish new internal complaints procedures. To date, no complaints have been received by the FSA or the IOPC regarding the use of PACE powers.

8.5 A voluntary interim inspection arrangement with His Majesty's Inspectorate of Constabulary, Fire & Rescue Services (HMICFRS) remains in place. No inspection by HMICFRS is expected for the first three years of the NFCU having access to PACE powers. We will continue to actively explore options to lay the primary legislation to bring our work on food crime under the inspection regime of HMICFRS.

8.6 Since the new powers came into force in May 2025, Food Crime Officers have exercised search, seizure, production order application, and post-arrest interview powers on 13 occasions across four operations. These powers have improved operational efficiency and reduced reliance on police and Local Authorities, allowing them to focus on other priorities while maintaining close collaboration. The NFCU secured a PACE production order within two days of receiving intelligence - previously a two-week process when dependent on police support. They have conducted prompt and effective premises searches following arrests by police, saving at least two hours of police time per search. Post-arrest interviews are now carried out independently, without the need for police or detention officer assistance in the interview room.

Additional Capabilities

8.7 A key priority outlined in the 2024 Annual Report was to '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.' The NFCU has further embedded the College of Policing's continuous improvement best practice, fostering a culture of evolution. A new internal change panel boosted staff engagement, while stress-testing made Standard Operating Procedures easier to use, which is vital to the governance and implementation of key NFCU processes. A cross-team project introduced a Quality and Standards Board, enhancing investigative rigour and organisational learning.

8.8 OCG mapping continues to develop with five OCGs operating in the UK now mapped onto a national platform for law enforcement. We have also sought to capture particularly successful

methods of disrupting OCGs in the food sector through calling upon the experience and specialisms of staff comprising a new working group, to develop a toolkit similar to the College of Policing ([footnote 8](#)) Menu of Tactics. An example of a tactic has been the NFCU's collaboration with the Insolvency Service.

9. Conclusions

9.1 Reflecting on last year's priorities, the NFCU is now achieving stronger results year-on-year, demonstrating its growing capability and influence in tackling food crime. It continues to deliver impactful disruptions against serious offenders. Targeted Prevention work focused on engagement, education, and intelligence sharing has supported resilience across all lines of defence. Strengthened international partnerships have improved cross-border collaboration, while new investigatory powers have boosted operational agility. Continuous improvement measures have further enhanced the unit's effectiveness in combating food crime.

9.2 The Board is invited to agree the four areas of NFCU focus for the coming year:

- Continue advancing our investigations toward successful criminal prosecutions by fully utilising our new investigatory powers, while actively monitoring how these powers are applied and assessing their effectiveness and benefits.
- Continue developing and enhancing our Prevention capabilities to improve resilience against food crime; while ensuring we sustain a strong deterrent and maintain a hostile environment for those who commit food crime.
- Enhance collaboration with Defra to support their efforts in mitigating the risks posed by illegal meat imports into the UK, with a focus on safeguarding biosecurity and protecting public health.
- Actively pursue opportunities to collaborate with international partners, in line with the FSA international strategy, by sharing knowledge and best practice to address emerging threats and common risk areas.

9.3 The Board is invited to:

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Annex

Annex A – Summary of Operational Outcomes

- In an NFCU-led investigation into waste diversion offences, convictions were obtained for four defendants and a food business for diverting meat unfit for human consumption back into the human food chain. The NFCU, working with Local Authorities, also removed 1.9 tonnes of illicit animal by-products from sale. The four defendants were later sentenced to over eight years imprisonment combined.
- Further to the above sentencing, our Financial Investigators secured a financial restraining order using powers under the Proceeds of Crime Act (POCA) against one of the principal defendants of this NFCU investigation, for £600,000. The restraining order also prevents

the defendant from selling his properties. This restraint order will enable the courts to ensure that any subsequent confiscation order made can be settled promptly.

- A guilty plea entered by a defendant relating to handling stolen goods, following an investigation by NFCU into the wider distribution fraud of a substantial amount of imported poultry valued in excess of £500,000. The defendant will be sentenced at the end of November 2025.
 - Supporting a multi-agency national counter-fraud operation, led by the City of London Police. The operation targeted food businesses suspected of laundering proceeds from payment diversion fraud. The operation resulted in the arrest of four individuals for immigration offences and fines issued, including £48,000 for one business. Two cease and desist letters were also issued relating to money laundering. One food business had payments ranging from £100,000 to £13 million recorded.
 - The NFCU supported Local Authorities in an operation relating to smokies and illegal slaughter. A defendant had previously pleaded guilty and was sentenced to 16 months imprisonment suspended for 18 months, 250 hours of unpaid community work to be completed in the next 12 months and £3000 costs.
 - At a POCA confiscation hearing a defendant involved in the illegal slaughter, manufacture and distribution of smokies across England, Wales, Northern Ireland and Scotland was ordered to pay £31,250. He will face a 12-month prison sentence if he fails to repay this amount.
 - Sixteen tonnes of misrepresented basmati rice in counterfeit packaging were removed from the market, which led to the arrest of five people, as part of an NFCU-led operation with assistance from Local Authority and policing partners.
 - In an NFCU-led investigation into the production and transportation of smokies, an NFCU Financial Investigator attended York Magistrates Court to apply for forfeiture of £5,560.00 seized from a suspect of this investigation. The application was successful, and the money was forfeited under the Proceeds of Crime Act. The evidence file for the criminal investigation has been submitted to the Crown Prosecution Service (CPS) for review and consideration of any charges to be brought.
 - A confiscation order was secured against an individual convicted of gangmaster offences in Northern Ireland, following a joint investigation with the Gangmasters and Labour Abuse Authority. The offender was found to have benefited by £32,500 from criminal activity and was ordered to pay an initial £2,400 within three months, or face imprisonment. Should further assets be identified, the case will be returned to court for additional recovery.
1. 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 micro-organisms being present.

2. 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.
3. 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.
4. The Food Authenticity Network provides information related to food authenticity testing, food crime prevention and supply chain assurance.
5. The Food Fraud Working Group was convened in May 2023 following a meeting between the FSA Chief Executive and food industry representatives, to consider where lines of defence against food crime could be further strengthened.
6. The Food Industry Intelligence Network (FIIN) was established by industry technical leaders in 2015 to help ensure the integrity of food supply chains and protect the interests of the consumer.
7. The Global Alliance is a coalition of international leaders who have agreed to work together on the prevention, detection and disruption of food crime.
8. The College of Policing is the professional body for everybody working across policing in England and Wales, established to set standards, share knowledge, and support professional development.