

.....

NATIONAL FOOD CRIME UNIT CONTROL STRATEGY

2020–21

.....

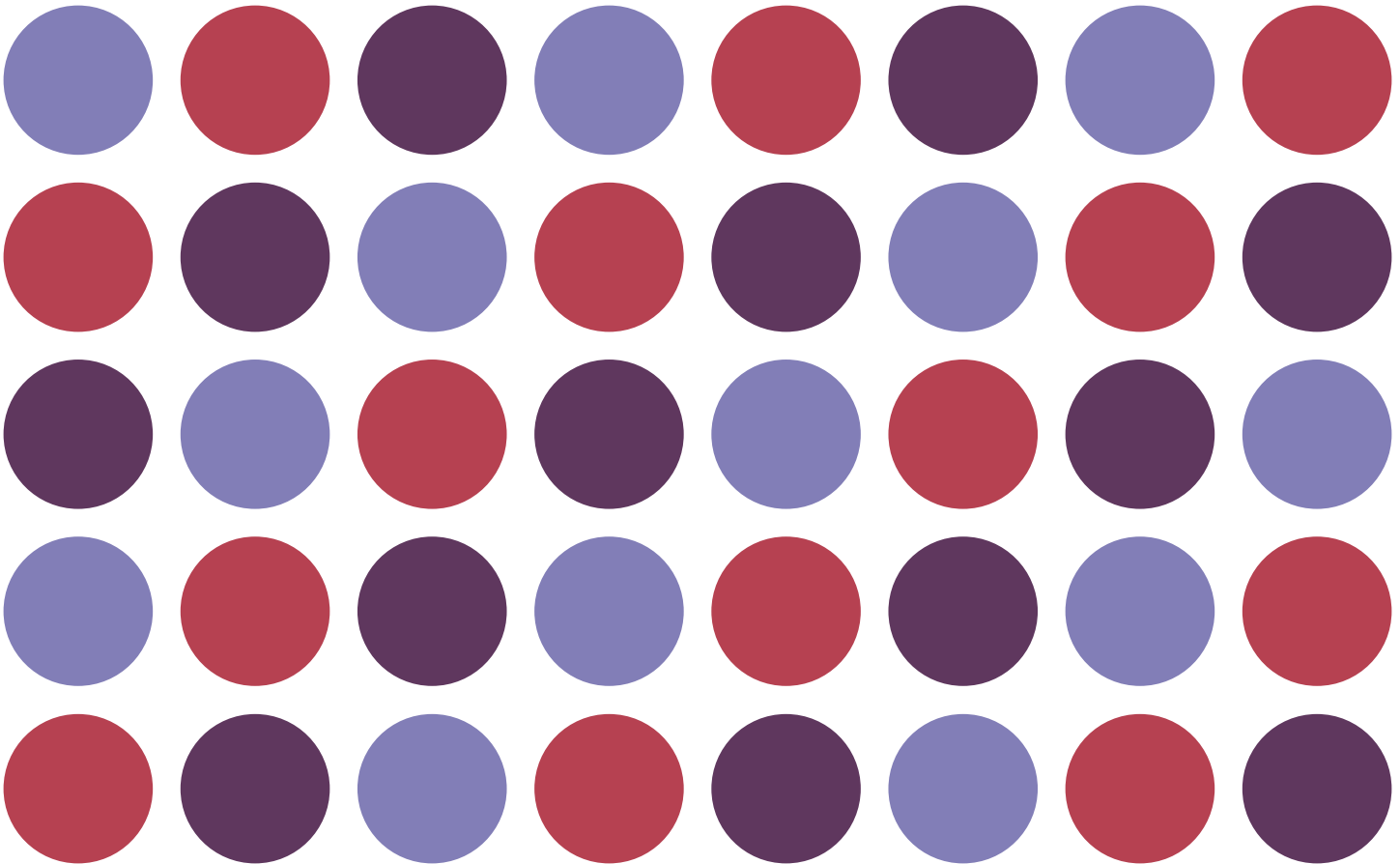


Table of Contents

- Dangerous non-foods sold for consumption to UK consumers 2
- The entry of illegal shellfish into the human food chain 3
- Criminality within the red meat sector with a focus on practices linked to theft and unlawful processing 4
- European Distribution Fraud within the food sector 5
- Illicit food supply servicing specific community demand 6
- The use of e-commerce platforms to facilitate food crime 7
- Vulnerabilities to, and prevalence of, food crime within food service 8
- Covid-19 9
- Next steps 9

The National Food Crime Unit (NFCU) is part of the Food Standards Agency. Its role is to detect, investigate and disrupt serious fraud and related criminality within food supply chains, across England, Wales and Northern Ireland. This also encompasses drink and animal feed.

The NFCU Control Strategy 2020-21 outlines the Unit’s current food crime priorities, and the actions we are taking to prevent food crime, deter and disrupt food criminals and bring offenders to justice. We also highlight areas where we are developing our understanding in order to improve our approach to tackling food crime.

Our Priorities

Our priorities are informed by our Food Crime Strategic Assessment 2020, produced collaboratively with Food Standards Scotland. Our priorities are derived through assessment of several aspects – scale of physical harm, breadth of issue and severity of impact. We utilise the [Management of Risk in Law Enforcement \(MoRiLE\)](#) methodology which allows us to compare different types of problems consistently, but we also consider areas where our requirement for deeper understanding of an area leads us to prioritise it. Some of our priorities are around specific commodities, others are around broader themes or underpinning crime techniques. While we do prioritise some product types, we must also emphasise that the majority of actors will be legitimate entities, whose products are safe and authentic.

We have been working to maintain our understanding of the impact on food crime of Covid-19. We also note our continued need for preparedness as we reach the end of the transition period, following the UK’s exit from the European Union.

Formulating our response

In designing our approach, we use the 4P approach, defined by the [Home Office Serious & Organised Crime Strategy](#). We will always endeavour to prevent and protect against incidences of food crime, while ensuring we are prepared to act. Where food crime does occur, we will lead, co-ordinate or support robust action against those involved. The main aspects of our activity across the 4P strands are outlined below.

Prevent	Protect	Prepare	Pursue
Diminish the means, motivation or opportunity to commit food crime.	Continue to develop our understanding of the methodologies, enablers and drivers of food crime.	Build understanding, capacity and capability around food crime with partners and industry.	Bring offenders to justice
Raise awareness of the threats, risks and consequences of food crime.	Work with partners and industry to design out vulnerabilities to food crime.	Develop and maintain strong working relationships including with our international counterparts.	Recoup criminally acquired financial gains through the use of the Proceeds of Crime Act 2002.

Dangerous non-foods sold for consumption to UK consumers

Dangerous non-foods pose arguably the highest risk of all areas of food crime. Dangerous non-foods include the toxic chemical 2,4-dinitrophenol (DNP), marketed as a weight loss aid. In the most extreme cases DNP consumption can cause death and has been linked to four deaths in the UK in 2019 and one further fatality in the first half of 2020.



The NFCU has identified and acted against DNP sellers and supported successful judicial proceedings at home and abroad, under food law and criminal law. The Unit is working across government to ensure that this substance is subject to the most effective form of legislative control.

Miracle Mineral Solution (MMS), a sodium chlorite solution, is marketed as a supplement with health benefits. MMS is not known to have resulted in any deaths in the UK but has the potential to cause severe illness and we note its promoted use around conditions such as autism and Covid-19.

Since 2015, few new threats of the nature of DNP and MMS have been identified on the market. However, it is essential we remain vigilant to identify new dangerous non-foods entering the market.

Our intelligence collection priorities

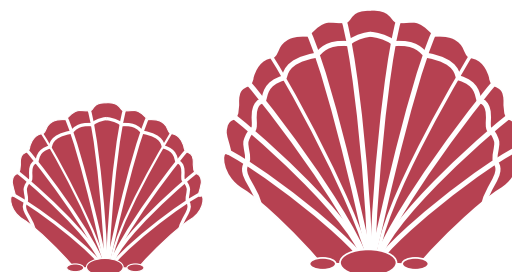
- The identity and activities of UK-based and foreign sellers of DNP, MMS and other dangerous non-foods
- Sales activity via the Dark Web, with particular attention on DNP
- Understanding the user base for DNP, to inform work to educate consumers and discourage use
- Newly emerging products with purported health or other benefits on the market which pose a risk to human health

Planned activity in this area includes:

- Bring about action against those selling these products for consumption in the UK
- Support partners in the identification of routes of entry of DNP into the country
- Working across government to raise public awareness of the risks
- Identifying substances of note within this threat area, through proactive scanning and engagement with subject matter experts

The entry of illegal shellfish into the human food chain

Illegal shellfish harvesting is known to be taking place at various locations around the UK coastline. Work over the past year has led to an increased understanding of the scale of this activity, and the levels of organisation involved in this.



We have increased confidence in our knowledge of the routes via which this product can enter the food chain – which is the Unit’s particular focus, noting the roles of other partners in terms of enforcement around shellfish harvesting on and offshore.

There are several potential routes for the onward sale of this product, including potential export to EU markets. It is highly likely that some product sold into the food chain is misrepresented in terms of origin and quality, posing risks to human health.

Our intelligence collection priorities

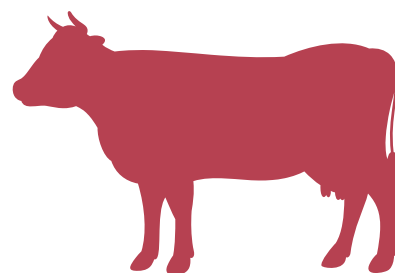
- How illegally harvested product is being sold into food supply chains and the level and nature of criminality required to get the illegal product to market
- If, how, and in what volumes illegally harvested shellfish is exported from the UK
- The degree of organisation, interaction and coordination amongst different groups known to be involved in illegal shellfish harvesting

Planned activity in this area includes:

- Collaborative enforcement and investigation around the entry of illicit product into the food chain
- Support to multi-agency days of action to prevent and disrupt illegal shellfish harvesting
- Intelligence analysis to identify links, trends and hotspots within this criminality, as well as key actors within illicit supply chains on which operational interventions should be targeted
- Consideration of target-hardening and the introduction of additional anti-fraud measures within shellfish supply chains
- Conducting fraud vulnerability assessments with businesses with the potential to be targeted by sellers of illegally harvested shellfish

Criminality within the red meat sector with a focus on practices linked to theft and unlawful processing

Livestock theft and unlawful processing remain key concerns in relation to red meat, with specific regards to how the resultant product enters the food chain and reaches consumers. This criminality can lead to potentially unsafe and untraceable food being sold, posing risks to human health.



The financial benefit from the theft of livestock is only gained through onward sale of the product; several food crime methodologies are subsequently employed to get meat from stolen livestock to market, including unlawful processing, misrepresentation and document fraud. Food crime within the red meat sector remains an emotive issue.

Within this area we also note a requirement to further understand the unlawful processing of poached game, the illicit diversion of animal by-products into the food chain and the role food brokers play in this sector.

Our intelligence collection priorities

- The methods employed to place stolen meat into the food chain, including where stolen meat may be being processed illegally within seemingly legitimate businesses
- The level of criminality and specific identified issues within the handling of game
- The illicit diversion of animal by-products back into the food chain
- The role of food brokers and how activity in this area might facilitate food crime

Planned activity in this area includes:

- Enhancing intelligence flows from our partners around livestock theft and illegal slaughter
- Bringing about prompt and effective tactical responses to identified issues through co-operation with police and local authorities
- Identifying any vulnerabilities within the game sector and how they might be designed out
- Profiling offender behaviour to identify early warning signs that persons are becoming involved in criminality within the red meat sector
- Communicating successful prosecutions of offenders to raise awareness of the consequences of criminality

European Distribution Fraud within the food sector

European Distribution Fraud (EDF) is where a person or persons imitate legitimate businesses in order to fraudulently procure goods or services from a foreign supplier. EDF can initially go undetected, and businesses only realise their identity has been impersonated upon request for payment of an invoice they have no knowledge of. Ultimately it is the foreign supplier who bears the cost of the fraud.



Once food is obtained through this route, further food crimes can take place during the handling, re-processing, storage and distribution of the product, for example in terms of misrepresenting quality, origin or durability date. There are also risks that aspects such as cold chain maintenance may not be adhered to, presenting risk to consumers.

The NFCU is aware of successful EDF attempts affecting UK businesses and their overseas suppliers in the past year although it is our assessment that the scale of the problem is likely to be more substantial than currently available data suggests.

Our intelligence collection priorities

- The scale and nature of attempted and successful EDF offences in the UK food and drink sector
- How food and drink obtained through EDF is subsequently stored, transported, and sold on into the food chain

Planned activity in this area includes:

- Enriching and expanding the data we hold on this threat area, to support further intelligence analysis on this area
- Using this insight to develop and focus enforcement and prevention interventions
- Supporting the action taken by partners against those committing EDF
- Communicating to industry the warning signs of EDF and how to protect themselves against this form of fraud

Illicit food supply servicing specific community demand

The UK is home to many communities whose cultures, heritage and connectivity extend internationally. Demand for food and drink products from home countries and cultures can result both in the illicit import of food products, including products of animal origin, and unlawful processing within the UK to meet this demand. Some aspects of demand have seasonal fluctuations or are linked to specific calendar events.



A concern in this area is the potential import of products posing a risk to human health or animal health (through transmission of diseases such as African Swine Fever).

Our intelligence collection priorities

- Specific products of concern which have high demand in this country, and how much of those are currently being imported or produced illicitly
- The methods used by those involved in this criminality to evade detection
- Where the main markets for these products are, in which communities and localities, and how these products are marketed

Planned activity in this area includes:

- Working with enforcement partners to identify where and how illicitly imported food is entering the country
- Improving intelligence sharing with international partners with regards to this issue
- Communicating the risks of illicitly imported or unlawfully produced food to communities most likely to be affected by this practice
- The development and implementation of appropriate interventions to prevent and disrupt this area of activity

The use of e-commerce platforms to facilitate food crime

Whether through mainstream platforms, social media, stand-alone trading sites or even the Dark Web, e-commerce is increasingly being used to market and sell food and food ingredients. Although this can bring tangible benefits to consumers, some of this trade will be fraudulent, deceptive or dangerous in nature.



This is an area of strategic interest for the Food Standards Agency and for NFCU. There are clear overlaps with other areas of priority, specifically around dangerous non-foods and the illicit servicing of demand from specific communities.

To date, NFCU work in this area has focussed on the sale of dangerous non-foods. However, e-commerce platforms are used to facilitate other types of food crime.

We are aware, for example, that e-commerce platforms can be used to sell fraudulent food, or to procure ingredients or other precursor materials for use in illicit practices within the food chain (such as antibiotics, adulterant materials or animal microchips).

Our intelligence collection priorities

- The extent to which e-commerce is used to facilitate or support food crime
- Areas within which e-commerce enables food crime through the sale of product not typically available in the UK
- Whether consumers purchasing fraudulent and unsafe food through e-commerce are aware of the risks linked to these products

Planned activity in this area includes:

- Improving our capability and capacity in relation to online investigation
- Reviewing our current knowledge of the facilitation of food crime through e-commerce, identifying specific intelligence gaps and how to fill them
- Working to refine and develop relationships with online platforms and marketplaces
- Developing and implementing preventative strategies which will further impede criminal activity in these environments

Vulnerabilities to, and prevalence of, food crime within food service

A food service business is a business responsible for the production, sale or transportation of any meal prepared outside of the home. This can be in settings such as cafes or restaurants, or in larger scale enterprises such as event catering or into venues such as canteens in a variety of establishments.



Several different types of food crime are possible within the food service sector and owing to the nature of the sector may manifest at scale.

Operating challenges for some food service businesses, including those linked to Covid-19, could increase vulnerability to food crime, as well as potentially providing an incentive for less scrupulous entities to engage in criminality. It is therefore a priority for the NFCU to better understand the vulnerabilities within this sector, the scale of food criminality and how we can work together to reduce any risks and to detect and disrupt offending.

Our intelligence collection priorities

- The scale of issues noted within the food service sector, including the types and volume of food crime taking place
- The nature of any recurring vulnerabilities within the various aspects of supply and distribution servicing the sector, as well as those arising at point of provision to the consumer

Planned activity in this area includes:

- Engaging with the food service industry to improve information flows regarding criminality within the sector
- Conducting fraud vulnerability assessments with food service sector businesses to identify and minimise risks where they are identified

Covid-19

Challenges experienced by the food and drink sector linked to Covid-19 and operational considerations affecting regulatory partners will influence the scale and nature of our response. Disruption to food supply chains has been assessed to have created areas of risk for the food and drink sector which could create an environment conducive to fraud.

Evidence of the criminal exploitation of food and drink sector disruption during the pandemic, in the UK, has been minimal. However, we will remain vigilant as the impact of Covid-19 changes around the world, along with any associated pressures on global supply chains.

Next steps

For us to be confident in our assessment of the greatest risks, it is essential we reflect on the impacts which changing social, economic and other factors can have on the food crime landscape. We will make public any updates to this Control Strategy.

We also provide regular updates to the FSA's Board regarding the work of the Unit and these will include capturing our progress within each of the areas of our Control Strategy.

If you have information to share about food crime, whether or not it relates to our priority areas, we encourage you to make contact with us. You can reach the National Food Crime Unit in one of several ways.

Call Food Crime Confidential on 020 7276 8787

Contact us via our online reporting form [here](#)

Email foodcrime@food.gov.uk

Visit www.food.gov.uk/foodcrime